

GAO

Report to the Chairman, Subcommittee on Oversight and Investigations, Committee on Energy and Commerce, House of Representatives

June 1987

EMPLOYEE SECURITY

GSA Has No Criteria for Assessing Adequacy



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**General Government Division**

B-226742

June 15, 1987

The Honorable John D. Dingell, Chairman  
Subcommittee on Oversight and Investigations  
Committee On Energy and Commerce  
House of Representatives

Dear Mr. Chairman:

This report is in response to your December 2, 1985, request, and subsequent agreements, to investigate security provided employees of the Environmental Protection Agency (EPA), the Department of Energy (DOE), the Federal Energy Regulatory Commission (FERC), and the Department of Transportation (DOT) at government-owned and leased facilities under control of the General Services Administration (GSA).

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## Objectives, Scope, and Methodology

Your request followed the reported violent death of an EPA employee at the EPA offices in Virginia leased by GSA, and you expressed the Subcommittee's concern about the adequacy of security for employees of agencies within its jurisdiction. You requested that we investigate several issues related to the use of contract guards, including comparing them with GSA Federal Protective Officers; determine why security is provided by contract guards rather than GSA Federal Protective Officers; and identify any security problems and limitations.

In response to your request, we examined security arrangements at 20 buildings in the Washington, D.C., area, and in Atlanta and Philadelphia. Our work included reviewing records of GSA and the four agencies within your Subcommittee's legislative jurisdiction, and interviewing officials of these five agencies in headquarters locations as well as in the selected regions. As discussed with your office, we did not attempt to determine whether security provided was or was not adequate. See appendix I for more details on our objectives, scope, and methodology.

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## Background

GSA's policy on protection services states that it has a responsibility to protect federal property under its control and to ensure a safe, secure environment for conducting government activities. GSA relies on its Federal Protective Service, a security organization with law enforcement authority in public buildings, to provide the level of protection necessary to meet GSA's responsibilities. Appendix II contains information on reported criminal activity in GSA-controlled space, including specific types of crimes against persons and property.

The GSA protection program is generally governed by policies set forth by GSA's Federal Protective Service Recovery Plan which was adopted in 1982. The Recovery Plan was developed as the result of a joint study by GSA and the Office of Management and Budget to assess problems confronting GSA's protection program and formulate a policy to provide a protection service with limited cost and personnel. It resulted in GSA developing a new approach calling for increased emphasis and reliance on security devices and systems, formalizing a mobile patrol concept, consolidating its Federal Protective Service law enforcement activities, and eliminating fixed guard posts for controlling access to buildings. According to Federal Property Management Regulations (41 CFR ch. 101, 7/1/85 Edition, Subpart 101-20.5, Physical Protection), GSA is required to conduct physical security surveys to determine the level of security needed to provide tenant agencies with adequate protection, which may include control of building entry. The regulations set forth GSA's policy that it will furnish as normal physical protection not less than the degree of protection provided by commercial building operators of similar space for normal risk occupants. No specific standards are provided. (See app. III.)

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## Results in Brief

According to GSA, it has not established standards for basic security levels for employees in federal buildings, as required by federal regulations. Further, GSA has not made physical security surveys of all properties under its control as required by federal regulations to determine the degree of protection to be provided to federal buildings, nor has it established criteria for assessing their vulnerability. Supplementing GSA's mobile patrols and other measures it provides as a service to its tenants, agencies may contract for guard and other services to provide access control to their buildings and additional security for their employees in GSA-controlled buildings. Thus, the level of security established tends to be determined by the individual tenant agencies and not GSA as required by regulations. As a result, in the 20 buildings for which we developed data, the access control security provided employees varied, with some buildings having no access control security at all. In the absence of specific GSA criteria to use in assessing vulnerability, the adequacy of employee security provided in GSA-controlled space would be difficult to determine.

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## Information Developed

The information we developed in response to your specific questions is briefly summarized below, and is discussed in detail in the attached appendixes.

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## Minimum Security Standards Not Established

GSA had not established minimum standards for security levels for employees in its buildings or for governmentwide use in the Federal Property Management Regulations at the time of our review—between December 1985 and September 1986. It had defined, however, but not established as standards, various levels of protection based on agency functions and contact with the public. The definitions range from closed facilities to open facilities. Closed facilities are those with fixed-post entry control functions or monitoring control systems. Authorized personnel are issued identification for access, visitors are controlled and escorted while in the facility, and detection systems protect against unauthorized entry. Open facilities are those with the facility accessible to the public without entry control during normal business hours; after normal business hours, a visitor's identity and business are verified. (See app. IV.)

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## Agencies Ultimately Determine Security

Basically, GSA's current role is to provide mobile patrols to respond to criminal or other incidents such as life-threatening events; investigate crimes and violations of federal statutes; install and maintain facility perimeter security devices and systems; perform physical security surveys and vulnerability assessments of all properties on a recurring basis; and provide physical security advisory services. Fixed-post security for access control to buildings is not now a service normally provided by GSA. As a result, agencies determine and fund the access control and level of security to be provided their employees. The use of contract guard services for building access control and employee security has become the primary agency option. EPA, DOE, FERC, and DOT have established their own organizations and guidelines for providing contract guards and security services to their employees. (See app. IV.)

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## Differences Between Federal Officers and Contract Guards

While a Federal Protective Officer is essentially a federal law enforcement officer with police powers who provides a mobile patrol and responds to calls, a contract guard is a private citizen with no police powers who staffs guard posts to control access to a facility. Their duties, functions, and responsibilities are dissimilar and so are their specialized experience and training. The GSA Federal Protective Officers' qualification standards and requirements are established by the Office of Personnel Management. Contract guard qualification standards are established under each contract. Appendix V contains a further discussion of Federal Protective Officers and contract guards.

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## Security at 20 Buildings

The access control security provided employees varied among the selected headquarters buildings we reviewed in the Washington area and the Atlanta and Philadelphia regional buildings. Security is predominantly provided through contract guards at the headquarters buildings and by lessors at the regional buildings. The extent of access control security provided varied from 24 hours a day, to working hours only, or to nonworking hours only, with some buildings having no access control security at all.

GSA had performed security survey assessments for 10 of the 20 buildings we selected for review, and reports were completed and available for 9 of these buildings at the time of our review. The assessments identified security hazards or deficiencies and differences in the security services provided, and concluded that the current protection services were adequate. In some instances, agency security personnel did not agree with GSA's conclusion, and we noted that at the time the assessments were made, GSA had not established criteria for assessing the vulnerability of federal buildings.

Appendix VI contains a detailed discussion of the 20 buildings by occupancy and location, the access control security provided, the security problems and limitations identified in GSA security assessments, and security enhancements or improvements identified by agency security assessments.

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## GSA Efforts Relating to Protection

In order to cover the matter of GSA's responsibilities regarding the security of agency property and personnel adequately, we obtained information from a GSA Inspector General report and an internal GSA management study. This information is presented in appendix VII. The Inspector General reported on difficulties experienced by GSA in implementing the main elements of the Federal Protective Service Recovery Plan. The internal GSA management study contains a number of proposals to the Administrator of GSA regarding changes and improvements in GSA's security program, including a proposed restructuring of the Federal Protective Service, that would affect its mission and role. According to GSA officials, GSA is considering or taking action on a number of the proposals.

GSA also is now delegating responsibility for building services, including security, to agencies for most single-tenant facilities. With delegated authority, agencies will no longer have to request and fund contract guard services through GSA. The delegations are viewed as positive by

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the four agencies included in our review. Each of these agencies has new security measures under consideration which will change the existing security.

Appendix VIII contains a further discussion of GSA's delegation of responsibilities for building services to agencies, the agencies' positive views on GSA's delegation of authority for contract guard management, and the agencies' security measures and proposals involving changes in contract guard services and security.

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## Conclusions

Different levels of security were being provided to federal employees at the various buildings included in our review. GSA's policy of eliminating fixed-post security and providing mobile patrols only is not fully in compliance with Federal Property Management Regulations. Required physical surveys had not been performed by GSA at all the locations we visited. Further, according to GSA, no standard existed as to what constitutes the basic level of protection service. No criteria existed for assessing the vulnerability of federal buildings. Without criteria, standards, and assessments, the physical protection need requirements cannot be objectively determined. Thus, the issue of security, which can be an emotionally charged one, involves decisions made on a decentralized and judgmental basis rather than by objective analysis based on GSA-established criteria and guidance.

As previously noted, GSA's Office of Inspector General and Public Buildings Service have been studying the role of the Federal Protective Service and its possible restructuring. The Administrator of GSA is currently considering what actions should be taken in the future based on the findings of the studies. Also, GSA's Public Buildings Service officials informed us in March 1987 that they are considering corrective actions which would resolve several of the issues raised in this report, including (1) the absence of a basic minimum standard level of security and protection service, (2) failure to adhere to requirements to make security surveys of all properties under its control, and (3) implications of GSA's present policy of not providing access control to buildings. In view of these ongoing actions, we are not making any recommendations at this time.

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As requested by your office, we did not obtain official agency comments on the report. However, we discussed the results of our work with the agencies and incorporated their comments where appropriate. EPA, DOE,

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FERC, and DOT officials are in general agreement with the information presented. GSA officials generally agreed with the facts, and, as noted above, had initiated corrective actions which would address our concerns.

As arranged with your office, unless you publicly announce its contents or authorize its release earlier, no further distribution of this report will be made until 30 days from its issue date. At that time, we will send copies of this report to the Director of the Office of Management and Budget, the heads of the agencies involved, the applicable House and Senate Committees on appropriations and oversight, and other interested parties. Copies will also be made available to others upon request.

Sincerely yours,



William J. Anderson  
Assistant Comptroller General



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**Abbreviations**

EPA	Environmental Protection Agency
DOE	Department of Energy
FERC	Federal Energy Regulatory Commission
DOT	Department of Transportation
GSA	General Services Administration
GAO	General Accounting Office
OMB	Office of Management and Budget
OPM	Office of Personnel Management



# Objectives, Scope, and Methodology

The December 2, 1985, request of the Chairman, Subcommittee on Oversight and Investigations, House Committee on Energy and Commerce, followed the reported violent death of an EPA employee at the EPA offices in Virginia leased by GSA, and expressed the Subcommittee's concern about the adequacy of security for employees of agencies within its jurisdiction. The Chairman requested that we investigate several issues related to the use of contract guards and their comparison with GSA Federal Protective Officers, determine why security is provided by contract guards and not GSA Federal Protective Officers, and identify security problems and limitations. The Chairman asked us to cover offices located in the Washington, D.C., area, and in selected regions, subsequently identified as Atlanta and Philadelphia.

At GSA, EPA, DOE, FERC, and DOT facilities, we interviewed personnel responsible for administrative and security functions; reviewed policies, guidelines, and regulations on security; and reviewed contract guard services, physical security surveys and assessments, lease files, crime incident reports, and other internal documentation related to security.

In response to the Chairman's request, and as agreed in various meetings held with the Chairman's office during the course of our work, we,

- obtained statistics on criminal activity in GSA-controlled space;
- identified the employee security services provided by GSA to its tenant agencies;
- inquired into the selected agencies' roles in providing security to their employees;
- compared and determined the differences between GSA Federal Protective Officers and contract guards;
- determined the security provided to employees at 20 GSA-controlled, government-owned and leased headquarters and field facilities, and determined the security problems and limitations identified by GSA and the agencies for some of these facilities;
- inquired into current studies underway by GSA on its Federal Protective Service mission and role and its proposed restructuring and future functions;
- inquired into changes taking place on the security of the selected facilities and on the GSA-proposed delegation of authority initiative and its impact on employee security measures and proposals; and
- did not attempt to determine whether security provided was or was not adequate because GSA has no criteria for assessing adequacy in GSA-controlled space.

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**Appendix I**  
**Objectives, Scope, and Methodology**

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We performed our work from December 1985 to September 1986 at the headquarters and field offices of GSA, EPA, DOE, FERC, and DOT in Washington, D.C.; Atlanta, GA; and Philadelphia, PA. Our work was performed in accordance with generally accepted government auditing standards.

# Criminal Activity in GSA-Controlled Space

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## Reporting of Crimes in GSA-Controlled Buildings

GSA states in its annual summary report of incidents occurring in controlled buildings that federal administrators and managers have long recognized the need for precise and accurate data on the amount of criminal behavior in government work space; and that without such data it would be difficult, if not impossible, to determine with any certainty the level of criminal activity in federal work space and to evaluate the effectiveness of prevention and intervention programs. GSA's Federal Protective Service collects and disseminates information about criminal activity on or against property under GSA charge and control. The Federal Property Management Regulations state that it is a responsibility of occupant agencies of GSA-assigned space to promptly report unlawful acts committed on or against property under the charge and control of GSA. However, GSA has noted in its annual summary report of incidents occurring in controlled buildings that the full extent of crime in GSA space may not be known to GSA because only those crimes which are reported to it can be identified.

GSA controls about 7,100 government-owned and leased buildings. GSA-reported crimes nationwide in buildings under its control during fiscal years 1976 through 1985 against persons and property are shown in tables II.1 and II.2, respectively.

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## Validation of Statistics

The GSA Office of Inspector General evaluated fiscal year 1984 statistics of incidents reported by GSA. The Inspector General's review showed that GSA's Central Office was accurately summarizing the statistics provided by its regional offices, but the accuracy of statistics from some of the regional offices needed to be improved. The GSA Inspector General, in its report dated July 11, 1985, Validation of the FY 1984 Statistics Included in the Annual Summary of Incidents Occurring in Buildings Controlled by the General Services Administration, concluded that appropriate management action had been taken or recommendations at the regional level had been made that should prevent these conditions from recurring.

**Appendix II**  
**Criminal Activity in GSA-Controlled Space**

**Table II.1: Reported Crimes Against Persons in GSA-Controlled Space Nationwide**

Fiscal Year	Murder	Rape	Robbery	Assaults
1976	3	2	50	229 <sup>b</sup>
1977	2	3	57	259 <sup>b</sup>
1978	2	15 <sup>a</sup>	47	278 <sup>b</sup>
1979	3	13 <sup>a</sup>	51	298 <sup>b</sup>
1980	3	6	71	474 <sup>b</sup>
1981	5	8	79	384 <sup>b</sup>
1982	4	6	72	441 <sup>b</sup>
1983	2	7	109	206 <sup>c</sup>
1984	0	4	47	113 <sup>c</sup>
1985	5	0	57	135 <sup>c</sup>

<sup>a</sup>Rape combined with other sex offenses.

<sup>b</sup>Aggravated and simple assaults combined.

<sup>c</sup>Aggravated assaults.

**Table II.2: Reported Crimes Against Property in GSA-Controlled Space Nationwide**

Fiscal Year	Burglary	Larceny	Motor vehicle theft
1976	236	7,155	129
1977	259	7,231	141
1978	245	7,617	181
1979	335	8,595	181
1980	556	12,486	220
1981	626	12,070	256
1982	740	11,143	257
1983	738	8,793	267
1984	600	7,872	222
1985	535	8,401	248

Source: GSA annual report of incidents occurring in controlled buildings.

## Incidents in Federal Buildings

GSA, in its decision paper dated July 1986 on the future direction of GSA's protection program, states that even though during fiscal year 1985 over 9,000 incidents involving either actions against people or property losses were reported to GSA as having occurred in federal buildings, an analysis of the nature of the incidents shows that very few are serious incidents involving people (murder, rape, robbery, and assaults), and that although every incident of this nature is serious, both to the victim and GSA, that the number and rate of such serious incidents, approximately 200 per year, is quite small when the daily federal employee population of approximately 800,000 is considered. GSA further noted

that during the first 6 months of fiscal year 1986, a homicide involving a federal employee and a family member occurred and another occurred where a federal employee was killed by an assailant unknown to her.

GSA further states in its decision paper that the total estimated value of the property losses nationwide was just over \$3.7 million for fiscal year 1985, and over 40 percent of the value of losses was non-government property. Thus, GSA notes that it is difficult to identify any significant number of incidents that are peculiar to federal space and that do not occur in any similar office space. GSA further noted that, unfortunately, no comparative data is available for office space in the private sector and that crime statistics, such as those accumulated by the Federal Bureau of Investigation, are by geographic area rather than by type of location in which they occurred.

GSA reported that data on the incidence of criminal activity in federal buildings suggest that perhaps the limited Federal Protective Officer resource is not being utilized in the most cost-efficient manner, and that in the majority of federal locations, many of the incidents could appropriately be handled by local law enforcement authorities. Appendix VII contains further information on GSA's Federal Protective Service mission and role, and on the GSA decision paper dated July 1986 on the future direction of GSA's protection program.

# GSA's Protection Program

Standard level user charge security services provided by GSA to its tenant agencies do not include building access control. The GSA protection program is generally governed by policies set forth by the GSA Federal Protective Service Recovery Plan formulated in 1981 and adopted in 1982. The Recovery Plan was developed as the result of a joint study by GSA and the Office of Management and Budget (OMB) to assess basic problems confronting GSA's protection program in order to formulate a policy to provide a protection service with limited cost and personnel resources. It resulted in GSA developing a new protection program approach calling for increased emphasis and reliance on security devices and systems, consolidating its Federal Protective Service law enforcement activities, formalizing the mobile patrol concept, and eliminating fixed-posts for building access control as a standard level user charge service. Tenant agencies are assessed a standard level user charge by GSA based upon the amount of space that they occupy, and in return, GSA furnishes its tenant agencies with space and services commensurate with those commonly offered in the commercial sector.

The Federal Property Management Regulations (41 CFR ch. 101, 7/1/85 Edition, Subpart 101-20.5, Physical Protection) prescribe policies and methods for the physical protection of persons, buildings, grounds, and equipment under the charge and control of GSA. The regulations enumerate the basic policy on physical protection, stating that for buildings and grounds for which GSA has space assignment responsibility, GSA will furnish as normal protection not less than the degree of protection provided by commercial building operators of similar space for normal risk occupants, as determined by the Federal Protective Service. No specific standards are provided. This protection may include control of building entry and inspection of packages when the Federal Protective Service determines the control is warranted for general government occupancy and not necessitated by special activities or specific agencies. Special protection required due to the nature of the business conducted within the space or unusual public reaction to an agency's program and mission, whether or not of a continuing nature, will be determined jointly by the Federal Protective Service and the occupant agency or agencies and will be provided on a reimbursable basis. The regulations further enumerate GSA responsibilities for physical protection, stating that the degree of normal and special protection provided by GSA shall be determined after completion of a physical security survey and/or crime prevention assessment.

Thus, Federal Property Management Regulations require that physical security surveys be conducted to determine the level of security needed

to provide tenant agencies with adequate protection, which may include control of building entry. However, GSA formulated the mobile patrol concept and eliminated fixed-posts for access control as a standard service without conducting the required physical security surveys. Some of these surveys have not yet been performed. GSA's July 1986 decision paper on the future direction of its protection program reported that about half of the buildings in GSA's inventory had not been surveyed.

## Background and History

Federal law authorizes the Administrator of General Services to appoint uniformed guards as special police to police public buildings and other areas under the jurisdiction of GSA, and under the exclusive or concurrent criminal jurisdiction of the federal government. Under the law, in relevant part,

"Such special policemen shall have the same powers as sheriffs and constables upon such Federal property to enforce the laws enacted for the protection of persons and property, and to prevent breaches of the peace, to suppress affrays or unlawful assemblies, and to enforce any rules and regulations made and promulgated by the Administrator or such duly authorized officials of the General Services Administration for the property under their jurisdiction . . ." 40 U.S.C. 318 (1982).

Employees appointed to these positions were classified as guards and functioned primarily as watchmen. Until the late 1960's GSA considered this level of security adequate for its needs.

The GSA Federal Protective Service was established in 1971, as civil unrest grew more prevalent during the Vietnam War and federal buildings frequently became targets of demonstrations and civil disobedience, to create a force of officers that could deal with these types of situations more effectively than the uniformed guards. Since 1971, GSA's annual appropriation acts and continuing resolutions have extended the police authority of GSA Federal Protective Officers to all areas owned or occupied and under the charge and control of GSA. In the early 1970's GSA's Federal Protective Service had about 5,000 uniformed Federal Protective Officers providing law enforcement and other security services for occupants of GSA-controlled buildings. However, as the Vietnam War drew to a close, the number of violent incidents and anti-war activities directed toward federal facilities began to subside, and GSA began to reduce the manpower allocated to its Federal Protective Service.

In 1980, GSA and the Office of Management and Budget conducted a joint study to assess the basic problems confronting GSA's protection program

in order to formulate a policy which would provide optimum protection service with limited cost and personnel resources. This effort resulted in GSA's development of the Federal Protective Service Recovery Plan, which was distributed to its regional offices in 1982. Basically, GSA developed a new and radically revised protection program approach calling for increased emphasis and reliance on electronic security systems and consolidation of its Federal Protective Service law enforcement activities by formalizing a mobile patrol concept and eliminating its staffing of fixed-posts for access control of GSA-controlled buildings.

The Federal Protective Service Recovery Plan constituted a major policy change regarding the delivery of protective services. The GSA protection program is generally governed today by policies set forth by the Recovery Plan. Today, GSA employs approximately 1,800 Federal Protective Officers with responsibility for more than 7,100 federal and leased buildings nationwide housing about 800,000 employees.

## GSA Position on Crime Prevention

The GSA Public Buildings Service Commissioner in 1984 issued a policy statement to all GSA Regional Administrators for the delivery of protection services. GSA's policy on protection services states that GSA has a responsibility and obligation to protect federal property under its charge and control and to ensure a safe, secure environment for conducting government activities. GSA's Federal Protective Service provides mobile response (preventive patrol and timely responses to criminal occurrences, incidents, and life-threatening events) law enforcement services as a standard service to GSA's tenant agencies. GSA does not consider nor provide fixed-post security for building access control as a standard service.

The Administrator of General Services said in GSA's annual report for fiscal year 1985 that GSA is at an important juncture in its history, and the role of the General Services Administration is being focused much more clearly on governmentwide administrative policy and oversight functions. Focusing on the future, the Administrator's annual report states that to reduce crime in federal facilities, the cooperation of federal employees is being enlisted through an expanded education and prevention program.

The Federal Protective Service stated in its annual report for fiscal year 1985 that it strives for a crime-free environment in GSA-controlled facilities. Its objectives and priorities are to reduce all offenses, particularly

larcenies and vandalism; to increase requests for crime prevention services through public presentations; and to reach 15 percent of its employees and tenant agencies with crime prevention information and employee awareness campaigns. The Federal Protective Service annual report states that crime prevention rests on the assumption that potential victims can reduce their own risks if provided with adequate guidance and support. The report stated that what is needed is a positive commitment to action in that only through management cooperation and employee participation in crime prevention efforts can crimes that occur on GSA-controlled property be substantially reduced.

## GSA Protection Program Policies Formulated Through the Federal Protective Service Recovery Plan

The major tenet of the Federal Protective Service Recovery Plan called for a realignment of existing Federal Protective Officers' functions in that Federal Protective Officers were to primarily provide mobile response. The Recovery Plan also made specific recommendations for all fixed-posts (entry-exit control) to be staffed by contract guard personnel, except posts in designated national security locations, and for all fixed-posts to be paid for on a reimbursable basis. The plan also addressed the existing definition of standard level user charge protection service, which lacked the specificity necessary to provide uniform and effective service to tenant agencies on a nationwide basis, by outlining the distinct services that would or would not be provided by GSA.

Tenant agencies are assessed a standard level user charge by GSA based upon the amount of GSA-controlled space that they occupy, and in return, GSA furnishes its tenant agencies with space and services commensurate with those commonly offered in the commercial sector. GSA redefined the standard level user charge protection service and made a basic assumption that the standard level protection the Federal Protective Service was responsible for was to provide perimeter protection and response service regardless of the customer agency's mission. GSA, in developing the protection program, determined that fixed-posts for entry-exit control or any other requirements directly attributable to a tenant agency's unique mission are not a standard level service. The redefined standard level services were then incorporated with identified functions and personnel tasks to develop a framework that would provide, according to GSA, an optimum protection service with the minimum but most effective level of dollar and personnel resources by GSA.

The operating guidelines of the program provided for (1) the operation of regional communications and control centers for control monitoring of

the perimeter alarm systems and other alarms and (2) rapid communications back-up with patrol units during emergency calls. The Federal Protective Officers were to be assigned only to metropolitan or other areas having a concentration of federal buildings and those areas demonstrating an historically high crime rate which would require dedicated patrol. Areas outside of the metropolitan or high crime areas would be patrolled by local police. The GSA tenant agencies could request contract guards under the program guidelines, but only on a reimbursable basis, and GSA's Federal Protective Officers were not to be assigned to reimbursable and/or fixed-post assignments. The only exception to assigning Federal Protective Officers to reimbursable assignments with fixed-posts would be for those agencies involved in national security operations. Thus, the policy change in the Recovery Plan resulted in a redefined protection program and the elimination of all standard level fixed-post guard positions. The implementation of the plan would result in the GSA tenant agencies determining the need for contract guards on a reimbursable basis from GSA.

## Standard Level User Charge Protection Services

GSA has issued a compendium (Compendium of Federal Buildings Fund Real Property Related Services, FPMR 101-21, Apr. 1983) to inform client agency officials of standard levels of service, including protection, that GSA provides in buildings under its assignment and control for payment of the standard level user charge.

The April 1983 compendium states that for all buildings and grounds under its charge and control, GSA will provide standard level user charge protective services through the use of personnel resources, technical resources, and arrangements with other law enforcement agencies. The standard level user charge protective services are defined as consisting of the following:

- 1) Preventive patrol and timely responses to criminal occurrences, incidents, and life-threatening events.
- 2) Investigation of crimes and violations of federal statutes.
- 3) Implementation of crime prevention activities, including tenant awareness programs.
- 4) Coordination of a comprehensive occupant emergency program.

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- 5) Installation and maintenance of perimeter security devices and systems.
  - 6) Performance of physical security surveys and vulnerability assessments of all properties on a recurring basis.
  - 7) A wide range of physical security advisory and consulting services.

The April 1983 compendium states that other protective services, which may include, but are not limited to, security guarding, specialized security patrols, and installing and maintaining specialized security systems and devices, may be performed on a reimbursable basis.

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## Reimbursable Protective Services

Reimbursable services are specifically requested by and performed for the convenience of the tenant agency. These services include those that are above the standard level user charge physical protection and building security prescribed by GSA. As previously noted, the Recovery Plan resulted in a redefined protection program. The reimbursable protective services are defined in the April 1983 compendium and include the following:

- 1) Specialized security services performed by uniformed and other personnel, because of an occupant's mission or the nature of the business conducted within a building, to include guarding as well as entry-exit control, inspection of packages, directed security patrols, special physical security surveys, and other similar activities.
- 2) Design, installation, maintenance, and operation of sophisticated electronic monitoring and communications systems, such as intrusion-detection devices, panic or emergency alarms, and remote monitoring systems.
- 3) Various target hardening procedures that may include, but not be limited to, the use of architectural and other barriers, access restrictions, and controlled vehicular and personnel traffic flows.

## GSA's Review of the Implementation of the Recovery Plan Found Problems in 1985

The GSA Office of Inspector General evaluated the implementation of the Federal Protective Service Recovery Plan and reported on difficulties experienced in implementing the main elements of the plan. The Inspector General reported in September 1985 that GSA had defined in its Recovery Plan the standard level user charge protection customer agencies should receive. However, difficulties were being encountered in performing the required physical security surveys and in the implementation of the mobile concept, the assigning of Federal Protective Officers to mobile patrols rather than fixed-posts. (Final Report on Review of the Implementation of Federal Protection and Safety Recovery Plan dated Sept. 12, 1985.)

The Inspector General reported that GSA was behind schedule in the installation of electronic security systems, which are needed to supplement the declining number of Federal Protective Officers to provide tenant agencies with protection, consistent with the initiatives of the Recovery Plan for increased use of security systems. Delays in installing the security systems are caused, in part, by difficulties encountered in performing the required number of physical security surveys. The surveys are to be conducted to determine the level of security equipment needed to provide tenant agencies with protection. The Inspector General noted that the GSA regions had delayed in either hiring additional personnel or contracting for the performance of physical security surveys, and that GSA physical security specialists on board had been assigned other tasks. The Recovery Plan goal of having all leased and government-owned buildings protected by GSA surveyed every 4 years has not been met.

The GSA Inspector General reported that the implementation of the mobile concept has encountered some difficulties because of the changed roles of the Federal Protective Officers and the attempt to adopt this program on a nationwide basis. The GSA Inspector General noted that the mobile concept maximizes the utilization of Federal Protective Officers in the Washington, D.C., area and in other metropolitan areas having a high concentration of federal installations, but that the mobile concept may be of questionable value in outlying areas. The GSA Inspector General stated that GSA's Central Office did not provide the GSA regions with adequate guidance for determining where the mobile concept would be most effective. From a policy standpoint, certain decisions had to be made as to where the mobile concept is feasible, i.e., metropolitan versus outlying areas.

The GSA Inspector General report concluded that GSA has been successful in defining in the Recovery Plan the standard level user charge protection tenant agencies should receive. The report also concluded that to fully implement the Recovery Plan and achieve the objectives of providing an adequate level of protection to tenant agencies while reducing the number of Federal Protective Officers and contract guards, special emphasis should be placed on the installation of security systems and the implementation of the mobile concept.

## GSA's Responsibilities for Physical Protection Under the Federal Property Management Regulations Have Not Been Met

The Federal Property Management Regulations prescribe policies and procedures for the management, operation, protection, and maintenance of government-owned and leased buildings and grounds required by the federal agencies to undertake their assigned missions. The regulations further note that it is the basic policy of GSA, with due regard for the program activities of the agencies concerned and the best interest of the government, to provide for or otherwise arrange for services required to house tenant agencies and permit them to carry out their programs in an efficient manner.

The regulations describe the standard levels of physical protection measures and building security services provided either as part of the standard level user charge or on a reimbursable basis. Specifically, the regulations state that GSA provides normal and special protection through mobile patrol or fixed-posts manned by Federal Protective Officers or contract uniformed personnel; security systems and devices; locking building entrances and gates during other than normal hours of occupancy; cooperation of local law enforcement agencies; or any combination thereof, depending upon the facility and the degree of risk involved.

The regulations' stated basic policy on physical protection is that for building and grounds for which GSA has space assignment responsibility, GSA will furnish as normal physical protection not less than the degree of protection provided by commercial building operators of similar space for normal risk occupants. This protection may include control of building entry and inspection of packages when the Federal Protective Service determines that the control is warranted for general government occupancy and not necessitated by special activities or specific agencies. The regulations further state that special protection required due to the nature of the business conducted within the space or unusual public

reaction to an agency's program and mission, whether or not of a continuing nature, will be determined jointly by GSA and the occupant agency or agencies and will be provided on a reimbursable basis.

The regulations prescribe GSA responsibilities for physical protection, as stated above, and require that the degree of normal and special protection be determined after completion of a physical security survey and/or crime prevention assessment. The regulations state that normal protection furnished by GSA may include control of building entry. However, GSA developed its current physical protection program through the formulation and statement of policy in its Federal Protective Service Recovery Plan that building entry is not a normal protection service, without performing the required physical security survey assessments. Thus, GSA has in effect determined that its normal protection service should be based on a policy statement and not on security survey assessments. Furthermore, GSA has not determined what physical protection security standards are warranted for general government occupancy. Therefore, even in those cases for which GSA has performed physical security survey assessments, security criteria have not been developed by which GSA can objectively determine the normal security requirements of its tenant agencies housed in GSA-controlled, government-owned or leased buildings, as prescribed by the regulations.

# Agency Determines Security to Be Provided Beyond GSA's Standard Service

Contract guard security services provided to federal employees are primarily an individual agency management determination, since fixed-post guard security for building access control is not a standard level user charge service provided by GSA. Security for federal employees is provided by (1) GSA through its law enforcement mobile patrol and other services, (2) the individual agency through contract guards for fixed-post security for building access control, or (3) the lessor.

## Security Provided to Federal Employees Is Primarily an Agency Management Determination

In 1983, GSA revised its compendium to the Federal Property Management Regulations to inform tenant agencies of the standard level user charge services that GSA provides for occupants and visitors in buildings under its control. The compendium includes information on the standard level user charge protective services, consisting of law enforcement and security activities, and reimbursable protective services that GSA provides. Specifically, in the compendium GSA informed tenant agencies that it provides preventive patrol and timely responses to criminal occurrences, incidents, and life-threatening events; investigation of crimes and violations of federal statutes; installation and maintenance of perimeter security devices and systems; physical security surveys and vulnerability assessments of all properties on a recurring basis; and physical security advisory and consulting services. GSA also announced that fixed-post security for building access control is not a standard service provided by GSA. GSA would provide, however, protective services above its standard services, such as specialized security services performed by uniformed and other personnel to include guarding as well as entry-exit control, directed security patrols, and other similar activities, on a reimbursable basis if requested and paid for by the agency.

This has resulted in the GSA tenant agency determining the level of security and access control to be provided to its employees. The use of contract guard services for building access control and employee security has become the primary agency option. Thus, the degree of security provided to federal employees has become primarily an individual agency management determination. Contracting for guard services in GSA-managed space, however, must be provided by GSA if the agency has not been delegated authority to do so by GSA, but the services are provided through direct contracting by the agency under delegated authority from GSA. In addition, contract guard security services may also be provided by lessors in GSA-leased space.

The four agency headquarters buildings in Washington, D.C., included in our review have contract guards because the agencies perceive a need

for more security than that provided by GSA. Although there is neither a GSA minimum security standard nor criteria for the level of security required for GSA-controlled, government-owned or leased buildings, agencies develop their security plans according to the same general factors for consideration, such as mission requirements, vulnerability assessments, environment, facility characteristics, and cost. However, even though the factors considered are similar, each agency decides on its own security controls according to its own circumstances and needs, which may vary for each agency and for each building and location.

EPA said it supports GSA setting minimum standards for government occupied buildings, believing that this will still allow the agencies to provide greater levels of protection as the threat requires or the budget allows. FERC said if baseline security standards exist, they should be distributed to all federal agencies for review and comment.

GSA does not have established required levels of security for its buildings. It has defined for classification purposes, but not established as requirements, various levels of protection based on agency functions and contact with the public. The definitions range from closed facilities to open facilities. Closed facilities are those with fixed-post entry control functions or monitoring control systems. Authorized personnel are issued identification for access, visitors are controlled and escorted while in the facility, and intrusion detection systems protect against unauthorized entry. Open facilities are those with the facility accessible to the public without entry control during the normal business hours; after normal business hours, a visitor's identity and business are verified. GSA has not established minimum security service standards for government-wide use in the Federal Property Management Regulations.

The Federal Property Management Regulations contain policies and methods for the physical protection of persons, buildings, grounds, and equipment under the charge and control of GSA. The regulations require active participation of occupant and user agencies in accomplishing certain aspects of crime prevention. The regulations state that physical protection responsibilities of occupant agencies include (1) cooperating to the fullest extent possible with all pertinent facility regulations and procedures, (2) making recommendations for improving protection, (3) promptly reporting unlawful acts committed on or against property under the charge and control of GSA to the nearest GSA office of the Federal Protective Service, and (4) providing planning and training guidance to employees on matters relating to protection and emergency response situations.

## Agency Security Organizations and Guidelines

At their headquarters, EPA, DOE, FERC, and DOT each have physical security personnel responsible for making studies and recommendations on security to administrative officials, who make the major decisions. The results of the administrative officials' decisionmaking process on security are then conveyed back to the security personnel for implementation. The decisionmaking process is generally not documented. After security personnel provide technical advice and recommendations, administrative personnel often add other tangible and intangible factors to their decisionmaking process, such as budget costs, political climate on security, and employee concerns on security, in arriving at a decision on providing adequate security within the concept of an open agency. In addition, some factors not within the control of an agency have an impact on the security provided, such as an incompatible tenant mix in a building, which the agency must deal with as best it can in providing security. An example of incompatible tenant mix would be a situation in which one set of tenants requires open areas to the building (open to the public) and another set of tenants requires controlled areas (closed to the public). Thus, each agency, whether under GSA's control for security or with its own delegated authority, determines the security it requires and has factors particular to it which have an impact on the security provided.

At each of their agency headquarters, EPA, DOE, FERC, and DOT have established their own organization and agency guidelines for providing contract guards and security services for their employees, as summarized in the following tables.

**Table IV.1: Agency Security Organization and Guidelines—Environmental Protection Agency**

<b>Agency:</b>	EPA - Environmental Protection Agency
<b>Organization:</b>	Facilities and Support Services provides a variety of administrative support services for EPA, including security, and is part of the Office of Administration and Resources Management in EPA Headquarters in Washington, D.C.
<b>Document:</b>	July 16, 1984, Facilities and Support Services Policy and Procedures Manual provides uniform procedures throughout EPA.
<b>Synopsis:</b>	Describes physical security procedures to prevent or minimize the effects of natural and human hazards, and is intended to provide a uniform approach to physical protection and to serve as an aid and reference source. It also provides for specific guidance about the selection and implementation of physical security measures.

## EPA's Physical Security Program

EPA's physical security controls are designed primarily to prevent or at least minimize the effects of natural and human hazards. EPA interprets physical security to mean safeguarding EPA personnel against injury and protecting material items against fire, theft, damage, or destruction. EPA states that security should be proportionate to the value and importance assigned the property, personnel, and mission (criticality), and to the susceptibility of each to criminal acts (vulnerability).

EPA's physical security policy and procedures manual establishes basic standards, procedures, and criteria for physically securing EPA facilities. Its stated purpose is to serve as an aid and reference source and lead to a uniform approach in providing physical security controls. The guidance contained in the manual is to be used to systematically analyze the physical protection requirements of each facility and to formulate appropriate safeguards and procedures. EPA notes that the guidance provided is general; it must be tailored to meet the particular needs of each facility.

EPA's physical security manual:

- provides for a security awareness of all EPA employees to help lessen the likelihood of crime, suggests appropriate responses to threats, and helps employees protect personal and government property;
- provides for a physical security education program to indicate the crucial importance of an educational program on physical security, identifies who is responsible for conducting it, and details what it should include;
- describes the organization of EPA's physical security protection program and explains the planning decisions to determine the level of physical protection needed by a facility;
- describes protection barriers that, combined with a well trained guard force, provide the first line of security;
- presents guidelines and procedures for securing the interior of a building in the event that perimeter and exterior controls have been breached;
- describes intrusion detection systems, how they work, and what they do;
- describes common locking devices and their strengths and weaknesses;
- describes the various guard services available to EPA, along with the duties, training, and qualifications required of contract guards, and also describes the procurement procedures and responsibilities associated with contract guards;

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- documents EPA's procedures for implementing and maintaining a personnel control system to help preclude unauthorized entry and facilitate authorized entry at personnel control points;
- provides guidelines for the conduct of security technical assistance visits, surveys, and inspections; and
- describes various aspects of an incident reporting program as an essential part of the security program.

**Table IV.2: Agency Security Organization and Guidelines—Department of Energy**

<b>Agency:</b>	DOE - Department of Energy
<b>Organization:</b>	Office of the Assistant Secretary for Defense Programs manages the DOE safeguards and security program, and the Office of Safeguards and Security provides directly for the Assistant Secretary's oversight of the safeguards and security policy and protection programs of DOE.
<b>Documents:</b>	(a) November 4, 1985, Department of Energy Order on Physical Protection of Security Interests, and (b) January 30, 1986, Draft Department of Energy Order on Headquarters Security Procedures.
<b>Synopsis:</b>	(a) Order prescribes DOE policies, objectives, responsibilities, and authorities for the physical protection of security interests and establishes minimum physical protection requirements and standards for such interests. (b) Draft Order prescribes uniform procedures for the operational control of headquarters buildings to provide protection of classified matter, property, equipment, and other resources under headquarters' control.

**DOE's Physical Security Program**

DOE's physical security program is directed toward the physical protection of security interests. DOE has prescribed policies, objectives, responsibilities, and authorities for the physical protection of security interests, and has established minimum physical protection requirements and standards for such interests. It is DOE's policy that the Department's security interests are to be protected from theft, sabotage, and other hostile acts which may cause adverse impacts on national security, program continuity, or on the health and safety of the public. Levels of protection appropriate to particular security interests are to be provided in accordance with the potential risks.

DOE's physical protection of security interests provides for:

- physical protection planning and access controls, with classified threat considerations developed and protection to be provided against theft, sabotage, facility seizure, and other criminal acts;

- establishment of access controls to prevent unauthorized access to security areas or removal of security interests;
- use of protective force personnel at Department-owned facilities; and
- physical protection of Departmental property and facilities providing for the establishment of property protection areas to protect against damage or destruction arising from deliberate acts of arson, civil disorder, riot, sabotage, terrorism, or vandalism and to deter and prevent the theft of government property at facilities.

The physical protection measures taken shall be adequate to give reasonable assurance of protection. DOE states it has the authority necessary to protect restricted data and to safeguard property. The authority covers the physical protection of security interests and the use of protective force personnel, and provides medical and physical fitness qualification standards and limited arrest authority and use of force by protective force personnel.

DOE has also drafted specific guidance to security requirements for its headquarters operations prescribing uniform procedures for the operational control of headquarters buildings. The DOE proposed headquarters security procedures provide for specific access controls and procedures to provide protection of classified matter, property, equipment, and other resources under headquarters control.

**Table IV.3: Agency Security Organization and Guidelines—Federal Energy Regulatory Commission**

<b>Agency:</b>	FERC - Federal Energy Regulatory Commission
<b>Organization:</b>	Division of Administration and Finance, Office of Program Management, administers all matters related to FERC physical, personnel, and information security.
<b>Document:</b>	April 15, 1985, Office of Program Management Administrative Directive on FERC Security Program.
<b>Synopsis:</b>	Provides policies and responsibilities for physical security, personnel security, and information security, and defines policies and procedures.

Note: FERC had an internal reorganization in January 1987 resulting in the security and safety functions being raised to the division level, which will report directly to the Executive Director.

## FERC's Physical Security Program

FERC defines physical security as that part of an overall security program which applies physical measures to protect personnel, facilities, materials, equipment, and documents against threats other than overt military action. FERC's policy states that physical security controls are essential to protect its facilities and resources, and it has issued an

administrative directive that defines and establishes its policies and procedures for a physical security program.

FERC states that it is important to recognize the limitations of physical security controls; they serve only to deter and delay and cannot be expected to preclude a determined intruder from unauthorized entry. FERC states that the procedures set forth in its administrative directive must be tailored to fit the particular needs of each facility, recognizing that every facility, regardless of its size or physical composition, has a need for some degree of security control.

The FERC security program provides for physical security planning and design and building controls. FERC notes that the extent to which the building exterior has to be secured depends on a number of variances, including the relative criticality of the facility, its location, how it is staffed, and working hours. The extent of the interior physical controls within a FERC facility will be largely determined by the value and importance of the items and areas to be protected and the vulnerability of the facility to unauthorized entry both during and after normal working hours.

FERC notes that security controls established at its headquarters facilities may differ from those established at FERC Regional Offices on access requirements, display of identification badges, removal of government-owned personal property, and security force. The administrative directive notes that in addition to the security measures established for the control of access to FERC headquarters facilities, and under the Delegation of Authority Agreement with GSA, FERC has determined that an onsite contract security force is necessary. FERC states that it is responsible for the day-to-day duties of the security force. The general duties of the security force include, but are not limited to, protecting and patrolling buildings; building access, with specific access requirements for normal duty hours and other than normal duty hours; parking control; and responding to security-related incidents and emergencies.

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**Table IV.4: Agency Security Organization and Guidelines—Department of Transportation**

<b>Agency:</b>	DOT - Department of Transportation
<b>Organization:</b>	Office of Security provides advice and assistance to the Assistant Secretary for Administration and to the Secretary on all security matters and investigations related to the security programs of DOT, and it ensures that the security programs are responsive to the needs of the Department.
<b>Documents:</b>	(a) November 29, 1977, Department of Transportation Physical Security Manual includes July 17, 1978, change.  (b) Draft Department of Transportation Order on Physical Security Program (undated).
<b>Synopsis:</b>	(a) Manual provides guidance to those directly or indirectly responsible for the development and maintenance of the physical security program at existing or proposed DOT facilities; serves as an aid and reference source in the selection and use of security control measures and the avoidance of excessive unwarranted expenditures for security controls; establishes basic standards and criteria for the procurement and use of security equipment, and the protection of DOT facilities and property; and achieves a greater degree of uniformity in the type of protective measures afforded DOT facilities.  (b) Draft order defines organizational relationships in the field of physical security; prescribes procedures for physical security planning and provides guidance on the conduct of physical security inspections; provides guidance in conduct of the facility physical security surveys; and prescribes reporting procedures for applicable reports to the Office of the Assistant Secretary for Administration.

**DOT's Physical Security Program**

DOT defines physical security as that part of an overall security program intended to apply physical measures for the protection of personnel, facilities, materials, equipment, and documents against threats, other than overt military action. DOT notes, however, that it is important to recognize the limitations of the physical security controls; namely, that they only serve to deter and delay and cannot be expected to preclude a determined intruder from unauthorized entry.

DOT has issued a physical security manual to:

- provide guidance to those directly or indirectly responsible for the development and maintenance of the physical security program at existing or proposed DOT facilities;
- serve as an aid and reference source in the selection and use of security control measures and the avoidance of excessive or unwarranted expenditures for security controls;

- establish basic standards and criteria for the procurement and use of security equipment, and the protection of DOT facilities and property; and
- achieve a greater degree of uniformity in the types of protection measures afforded DOT facilities.

DOT notes that the manual is limited in scope to the salient aspects of physical security, covering such varied topics as access controls, physical barriers, guards, contingency plans, inspection procedures, etc. DOT states that because of the broad range and dissimilarity of facilities within DOT, the guidance set forth in the manual must be tailored to fit the particular needs of each facility. It recognizes that every facility, regardless of its size or physical composition, has a need for some degree of security control.

DOT has drafted an internal order on its physical security program to:

- define organizational relationships in the field of physical security;
- prescribe procedures for planning physical security and provide guidance on the conduct of physical security inspections for activities at each facility determined to be mission essential or vulnerable to sabotage, theft, robbery, burglary, and other forms of criminal activity;
- provide guidance in conduct of the facility/installation physical security survey; and
- prescribe reporting procedures for applicable reports to the Office of Assistant Secretary for Administration.

DOT states that this order will apply to all agencies, activities, and organizations of the Department having responsibility for the control, movement, storage, maintenance, and/or physical security of personnel, material, equipment, facilities, and documents.

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## Delegations to Agency for Management of Contract Guards Viewed as Positive

The four agencies now have delegated authority for their headquarters facilities. FERC and DOT view the ability to contract for and manage the contract guards directly as an improvement in their security services. However, both believe guidance is needed. FERC informed us that if baseline security standards exist from GSA, they should be distributed to all federal agencies for review and comment. DOT informed us that as an agency which has been delegated building management authority and implemented contract security services, it recognizes the need for guidance to assist agencies in determining needs and assessing contract proposals and costs.

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The other two agencies, EPA and DOE, had requested the authority to contract directly for contract guards as an improvement in their security services, in lieu of requesting and paying GSA, which acts as the contractor for the services. DOE was delegated the authority by GSA in June 1986 to provide its own protection services. EPA received delegation of authority for operation and lease administration of its headquarters facilities in Washington, D.C., in January 1987, with protection of these facilities part of the operational requirements delegated to EPA by GSA.

Appendix VIII contains a further discussion of the current GSA proposal to delegate responsibilities for building services to agencies and the agencies' views on delegation authority for contract guard management.

# Differences Between GSA Federal Protective Officers and Contract Security Guards

A comparison of GSA's Federal Protective Officer with contract guard security personnel shows a basic concept and role difference. A GSA Federal Protective Officer is essentially a federal law enforcement officer with police powers who provides a mobile patrol and response to calls. A contract guard is a private citizen with no police powers who provides a fixed-post access control to a specific facility. The duties, functions, and responsibilities of Federal Protective Officers and contract guards are dissimilar and so are their specialized experience and training.

## Comparison of Qualification Requirements

The primary difference in the qualification requirements for contract guards and Federal Protective Officers is specialized experience and training. Federal Protective Officers are required to have specialized experience that has provided a knowledge of law enforcement methods and protective systems and techniques, and contract guards are not required under GSA contracts to have similar experience. Also, Federal Protective Officers undergo more training than contract guards. Federal Protective Officers must successfully complete a training course at the Federal Law Enforcement Training Center. The reason for the specialized experience and additional training is that Federal Protective Officers have police powers, whereas contract guards do not. Contract guards cannot make arrests nor conduct investigations. Federal Protective Officers are required to have a valid driver's license because they function as mobile patrol units, whereas contract guards do not. The current functions and tasks of Federal Protective Officers and contract guards were established under the Federal Protective Service Recovery Plan.

## Differences in Tasks Between Federal Protective Officers and Contract Guards Under the Federal Protective Service Recovery Plan

We compared the major tasks and responsibilities of the Federal Protective Officers and contract guards established under the Federal Protective Service Recovery Plan and noted the following differences:

- Contract guard personnel perform all fixed-post assignments for entry-exit control. (The exception is fixed-posts located in a designated, existing national security location.) They handle calls for service involving incidents of a noncriminal nature and summon appropriate law enforcement personnel (Federal Protective Officers or local police) to all criminal occurrences. They do not have the authority to enforce federal laws and regulations.
- Federal Protective Officers perform mobile patrol; respond to activated fire and security alarms and calls for service; conduct preliminary investigations of crimes and incidents occurring on GSA-operated property;

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enforce all federal laws and regulations; arrest offenders; monitor on-site guard service contracts; and staff fixed-posts located in agencies whose missions relate to national security.

Thus, because of the differences in tasks and responsibilities shown, Federal Protective Officers and private contract guards are not comparable. Generally, contract guards have no more authority than do private citizens. Further, the experience, training, and related requirements for Federal Protective Officers are promulgated by the Office of Personnel Management (OPM Qualification Standard for GSA Federal Protective Officers, GS-083 Police Series). Contract guards' qualification requirements (education, experience, training, etc.) are contained and established under each individual contract. In addition, contract guards' specific duties may vary according to the needs of each agency for each installation.

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# Security Problems and Limitations

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We determined the extent of security provided to employees of EPA, DOE, FERC, and DOT at 20 GSA-controlled, government-owned and leased headquarters and field facilities. Also, GSA and the agencies have identified security problems and limitations for some of these facilities.

The access control security provided employees varied among the selected headquarters buildings in the Washington area (six buildings) and the Atlanta (nine buildings) and Philadelphia (five buildings) regional facilities. The security is provided predominantly through contract guard arrangements at the headquarters buildings and is predominantly lessor provided at the regional buildings. The access control security provided varies from 24 hours per day, to working hours or to nonworking hours, with some buildings having no access control. In addition, some buildings contain multiple federal tenants or a mixture of federal and private sector employees, and tenants in these buildings may be obtaining and providing security services to meet their own needs, also benefiting other tenants in the building.

The building security for the selected 20 buildings occupied by EPA, DOE, FERC, and DOT in Atlanta, Philadelphia, and Washington is illustrated in the following summary table.

**Appendix VI  
Security Problems and Limitations**

**Table VI.1: Building Guard Security Data—Summary Table**

	City and Agency										Totals
	Atlanta			Philadelphia <sup>b</sup>			Washington				
	EPA	DOE/ FERC <sup>a</sup>	DOT	EPA	DOE	DOT	EPA	DOE	DOT	FERC	
<b>Building Data</b>											
Number	4	1	4	1	1	3	2	2	1	1	20
Type:											
Owned	1				1	1		2			5
Leased	3	1	4	1		2	2		1	1	15
Tenant:											
Single or dominant	2		3	1		1	1	2	1	1	12
Multi-tenant	2	1	1		1	2	1				8
<b>Guard Security Data</b>											
Guard:											
Fixed-post	3	1	4	1	1	1	2	2	1	1	17
No fixed-post	1					2					3
Fixed-post access:											
Open hours		1			1				1		3
Closed hours	1		2	1		1	1				6
24 hours	2		2				1	2		1	8
Access control provider:											
Lessor provided	3	1	3	1		1					9
Agency provided			1		1		2	2	1	1	8
Agency provided:											
GSA reimbursable			1		1		2	2			6
Agency direct									1	1	2

<sup>a</sup>Agencies housed in same building.

<sup>b</sup>FERC not located in Philadelphia.

## Security Problems and Limitations Identified by GSA

GSA has performed security surveys for only 10 of the 20 selected buildings, and reports for its security survey assessments were completed and available for 9 of the buildings. The implementing guidelines for the Federal Protective Service Recovery Plan provide for physical security surveys to be conducted for all GSA-controlled buildings once every 4 years. The Federal Property Management Regulations require that the degree of normal and special protection be determined after completion of a physical security survey. As previously noted, GSA decided what protection services (mobile patrols) will be provided for all GSA-controlled buildings without conducting the required physical security surveys. In addition, the limited number of GSA security survey reports—one of the nine buildings in Atlanta, four of the five buildings in Philadelphia, and four of the six buildings in Washington—identified security hazards or deficiencies and variances in the security provided.

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At the same time the reports concluded that the current protection services were adequate, although GSA does not have established minimum security criteria for the buildings it manages.

Regional GSA Federal Protective Service protection specialists conduct the physical security surveys of GSA-controlled buildings. The specialists evaluate the crime and incident statistics and the risk potential of the site and make recommendations to correct existing inadequacies. A discussion of the security problems and limitations GSA identified for the Atlanta, Philadelphia, and Washington, D.C., buildings follows.

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## Atlanta Buildings

As of April 1986, GSA had completed surveys on about half of the facilities within the Atlanta Region, which included one of the nine Atlanta buildings covered in our review. This survey of a federally owned building was performed in January 1985. GSA notes that there are no records on file for a previous survey. The purpose of the physical security survey was to evaluate existing physical security and provide a basis for recommendations to improve security where necessary.

The facility is located in a high density populated area in a downtown business district, with the area surrounding this facility having a low crime rate. The potential risk for the facility is from thieves and vandals, and potential threats against this facility would be from theft of personal or government property, theft or compromise of unclassified sensitive materials, and vandalism. EPA is the primary occupant of this facility and there is no regular contact with the public. This facility does not have any set operating hours and the building is not open to the public. The current protection service provided to the facility comes from the GSA Federal Protective Service mobile patrol, and the response time will be over 10 minutes. GSA notes that although this is a GSA-operated facility with exclusive federal jurisdiction, the local police would respond within 5 minutes.

There were various security findings and recommendations intended to enhance security of this facility, primarily involving vulnerabilities which would allow intruders to enter the building. This facility does not have exterior barriers or a security intrusion detection system. The GSA building manager told us that no action will be taken to enhance security of this facility because the building is not open to the public and is slated for disposal.

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## Philadelphia Buildings

As of April 1986, GSA had completed four of the five physical security survey reports for the five Philadelphia buildings included in our review: two federally owned buildings and two leased facilities. The GSA physical security surveys included a number of observations on security hazards or deficiencies of the facilities and a series of recommendations for the vulnerabilities encountered, including the need for crime prevention lectures. Examples of the GSA physical security surveys follow.

### GSA Assessment of Security of a Federal Building With a DOE Tenant

GSA performed a physical security survey of a federal building in June and July 1984 to evaluate the risk potential of the facility. GSA noted that there had been no prior physical security surveys conducted at this building. The facility houses 10 tenant agencies, including DOE. The primary occupying agency is the Veterans Administration.

The building is located in a Philadelphia Police Department Center City Business District which has a high crime rate. The building has 11 floors and a basement, with some areas of the building open to the public and some areas closed to the public. The level of public contact is high, with the majority of the public contact centering on three of the tenant agencies; the Veterans Administration Outpatient Clinic, Department of Defense Recruiting Offices, and a Military Entrance Processing Station.

The GSA security survey report notes that the risk potential for this building is the same as the risk for most office buildings (burglary, larceny, robbery, and vandalism); and because it is a federal building there are risk potentials from demonstrations and bomb threats. In addition, GSA notes that there are risk potentials unique to this building, such as threats from patients who come to the Veterans Administration Outpatient Clinic for treatment where there is a supply of drugs and related paraphernalia.

GSA notes that about 700 government employees work in this building. The building is opened at 6:30 a.m. and secured at 5 p.m. After normal business hours, access to the building is gained by a key card system. The tenant agencies in this building operate on a flexitime work schedule from 6:30 a.m. until 6 p.m. Several agencies in the building might have personnel working after hours, but this is rare, according to GSA. Saturday work is rarely scheduled, but employees have the option to come in on their own. The Military Entrance Processing Station and the Recruiting Office are open one Saturday per month during the school year.

GSA states in its report that the Federal Protective Service does not have sufficient personnel to assign a Federal Protective Officer to this location, but the Federal Protective Service does provide a mobile response to this building when called. The response time is approximately 5 to 10 minutes, depending on the officer's location and the amount of traffic. GSA notes that the jurisdiction for this building is proprietary, and assistance from the local police department is available when needed and is more than adequate. Proprietary means the federal government has acquired some right to an area in a state but has not obtained any measure of the state's authority over the area. Under proprietary jurisdiction, the local or state law enforcement agencies are principally responsible for enforcing the law.

GSA states that there are two security guard contracts providing protection services for this building. One is an armed guard contract service that deals with the first floor and floors 6 through 11 from 6:30 a.m. to 6:30 p.m. Monday through Friday, excluding holidays. The contract calls for a fixed-post on the first floor from 6:30 a.m. to 5:30 p.m. which then becomes a roving-post throughout the floors covered by the contract from 5:30 p.m. to 6:30 p.m. The second contract provides for an unarmed guard service covering the second through fifth floors. This contract has two posts, a fixed-post on the second floor and a roving-post throughout the second through fifth floors. The contract guards respond only to their assigned floors and do not respond to the other floors. GSA notes that after passing the guard in the lobby, access control to a section of this building is dependent upon what the particular agency has set up.

The GSA physical security survey included a number of observations on the security system of this building and a series of recommendations for improvements. For instance, GSA noted front doors that do not close completely after the key card access is used; key cards issued to tenant agencies upon request without a set policy for their issuance or accountability; and a closed circuit television camera in the lobby of the building being used as a deterrent because there is no monitor attached to the camera. On this item, GSA noted that the camera is positioned to cover the elevator section of the lobby. GSA recommended that the camera position be reversed so that the camera is facing the front doors in order to be seen from outside the doors and thus increase its use as a deterrent. GSA also noted that crime statistics show an increase in the number of reported crimes, and recommended that each tenant agency in this building be made aware of and encouraged to take advantage of the

crime prevention related programs that are offered by GSA's Federal Protective Service.

GSA Assessment of Security of a  
Federal Building With a DOT  
Tenant

GSA performed a physical security survey of a federal building during the period April through June 1984 to evaluate the risk potential of the building. GSA noted that there had been no previous physical security surveys conducted at this building.

This is a multitenant building with DOT as one of the tenants. The U.S. Customs Service is the primary agency in this building. The building serves as a federal facility for numerous agencies with a variety of missions employing about 1,300 people. GSA notes that the working hours of the numerous government agencies reflect a time element spanning from 8 to 24 hours per day, 7 days per week.

The building consists of 17 floors with a basement and subbasement. The building is located in a historical section in the highest crime rated district in the city of Philadelphia. GSA notes that the building has a volume of pedestrian traffic which poses a possible threat to life and property. In addition, the worth of the property serves as an incentive for theft because of its high market value, portability, or easy disposal.

In an analysis of crimes and incidents in 1983, GSA determined that the majority of the crimes occur between the hours of 4 p.m. and midnight, and there is a definite problem with people entering and remaining in the building after normal duty hours. GSA notes that this is essentially an open building with controlled access to only a few agencies' offices, with numerous incidents occurring during late afternoon and evening hours.

GSA's security assessment notes that the federal building does not require specific government identification to gain entry or exit. Since this is essentially an open building with controlled access to only a few agencies' offices, some agencies require the use of agency identification to gain access, and others utilize a door lock system to control entry. This building is provided protection service by GSA's Federal Protective Officers operating in a mobile patrol and response mode, and there is no contract guard service providing any security at this building. GSA notes that the current average response time for Federal Protective Officers to arrive at this location varies from 5 to 15 minutes, and that the large span of response time is due to a personnel shortage.

GSA's risk analysis reflected potential threats from (1) unwarranted loitering, considered the most critical concern of the tenant agencies, due to the large number of derelicts entering, roving, and occasionally remaining in the building during nonduty hours; (2) theft of personal and government property; and (3) vandalism, especially when coupled with after hours loitering.

As a result of GSA's crime analysis, GSA noted that Federal Protective Officers should periodically check with the agencies' supervisors regarding incidents of suspicious persons, criminal activities, accidents, and/or unreported incidents that may have been deemed not worth reporting. GSA noted the need for higher Federal Protective Officer visibility inside the building by more walk throughs, more agency liaison, and crime prevention presentations. GSA recognizes the need for high visibility and more visitations, stating that if tenant agency officials are contacted more frequently, the effectiveness of the Federal Protective Officer police patrols would be enhanced.

GSA's protection assessment noted that this building is being protected by a perimeter alarm system that provides adequate security in accordance with the standard level of protection provided by GSA. The system is activated at 6 p.m., deactivated at 6 a.m., and is monitored at the GSA Federal Protective Service Regional Control Center. The building does not have any interior access controls other than those installed for individual agency use, and there are none utilized for the building other than the automated systems that pertain to the perimeter alarms and the exterior key card system. GSA notes that there are several agencies housed in this facility that incorporate an intrusion alarm system on the perimeters of their office areas.

GSA says that the federal government has exclusive jurisdiction over this building, yet the security survey notes that liaison was established with the city police department, which will provide all normal law enforcement services to this building consistent with the police department jurisdiction and policies.

**GSA Assessment of Security of  
Leased Building Office Space  
With a DOT Tenant**

GSA performed a physical security survey of leased building office space during December 1984 to evaluate the adequacies of the existing perimeter system and make recommendations to correct any inadequacies. The building contains 12 floors, 1 basement, 1 mezzanine, and is the headquarters for an insurance company. There are three federal agencies in the building, including DOT, which is not the primary occupant agency.

The jurisdiction for the affected space is proprietary. Federal proprietary jurisdiction means the federal government has acquired property rights to an area in a state, but that the state retains police authority over the area. Under proprietary jurisdiction, the local or state law enforcement agencies are principally responsible for enforcing the law.

The leased office space is characterized by GSA as open facilities housing nonsensitive governmental functions. Nonsensitive, as defined by GSA, means an agency's functions involve contact with the public on a daily basis, and the public is allowed inside the premises without restriction in the public areas. GSA notes that during normal business hours the facility is accessible to the public without entry control.

GSA notes that the building is located in the Center City Business/Historical District, the highest crime rate District in the city of Philadelphia. Regarding the history of crime and/or incidents, GSA notes that some tenant agencies were not aware of services provided by GSA's Federal Protective Service, and nothing has been reported to the Federal Protective Service for the leased office space at this location for the past year.

GSA noted that the 3 agencies had approximately 165 people in the affected leased space. GSA noted that the level of public contact for all agencies in the affected lease space is generally low and does not pose a threat to life, property, or public order and requires only nominal protection and building perimeter security. The overall value of property for the affected leased space is high and serves as an incentive for theft because of its high market value, portability, or easy disposal. Regarding the risk potential, GSA determined that there is essentially minimum risk for this building, since it is a national headquarters for an insurance company.

GSA's assessment of current protection services noted that the local police department provides the local law enforcement response, and Federal Protective Service mobile response is also provided. Contract security is provided by the building management. One guard works the control station and one works the lobby. GSA noted that although the building has extremely low public contact, anyone who dresses in an acceptable business fashion and can act with a minimum amount of confidence can compromise security.

GSA's assessment of the security system notes that there are no electronic intrusion detection systems in either the government space or the lessor space, and there are no perimeter systems in the affected leased

space. GSA states this is inadequate in regards to the guidelines for perimeter security systems and the high crime rate for this particular section of the city. GSA noted that the only way this can be considered an adequate situation is the fact that there was no crime reported to GSA's Federal Protective Service for the past year for this location.

GSA stated in its physical security survey report that the existing perimeter security systems for all agencies in the affected office space are inadequate since they are nonexistent. GSA noted that there are no planned building modifications to the leased space, and whatever action is taken should be based on the consideration that the insurance company lessor is tentatively not planning to renew the government lease after it expires. GSA also stated that the employees are not aware of the importance of providing immediate information to GSA's Federal Protective Service on incidents occurring in their building. It recommended a crime prevention lecture to keep employees aware that although they are in a low crime rate building, they are still in a high crime rate environment.

## Washington Buildings

As of September 1986, GSA had completed four physical security surveys of the six Washington buildings included in our review, three on leased facilities and one on a federally owned facility. Although there were differences in the security provided the facilities and there was a history of crime incidents at some facilities, GSA determined that the security was adequate. A synopsis of GSA physical security surveys follows.

### GSA Assessment of Security of a Leased Building With an EPA Tenant

GSA performed a physical security survey of a leased building in Virginia in November 1985. GSA states it had no previous survey on file that would determine standard level security requirements, and this survey was conducted in accordance with GSA's 1982 protection initiatives.

The facility is located in a metropolitan business and residential area composed of interconnecting buildings, commercial office space, shopping arcade, and parking garage levels. The facility has 11 floors of office space, 2 parking levels, 1 ground level, and 1 plaza level. The government leases the 11 floors of office space, and the property is owner-operated with proprietary jurisdiction.

The facility is a multitenant building housing three agencies with 1,345 federal employees. The EPA is the major occupant agency with 735 employees. The other tenants are components of the U.S. Navy and the

Department of Commerce. GSA notes that the building is located in a metropolitan business district, interconnecting with other buildings and commercial businesses, and the surrounding area has a moderate crime rate, which could adversely affect the security of this facility. GSA further notes that the level of public contact for this facility is high due to the U.S. Naval Civilian Personnel Command and the Department of Commerce Patent Office being located in this facility.

GSA's security survey report noted a history of crime incidents at this facility. In its analysis of the risk potential, GSA determined that the nature of the work by the Environmental Protection Agency, Department of Commerce Patent Office, and the Department of Defense creates a potential threat of theft of government and personal property, bombings, theft or compromise of classified material, arson, and vandalism. Nevertheless, GSA states in its security survey report that the current protection services are adequate for this facility. The GSA security survey report states that the facility has no entry and exit control during normal working hours, and that during security hours (during nonworking hours), entry and exit is controlled by contract guards at the lobby by the main entrance.

The current protection services are provided by contract guards, and GSA determined that contract guards are performing their duties as required. The basic duties of the contract guards are access control during security hours, performing roving patrols, being watchful of security and fire violations as well as thefts of government and personal property, and responding to emergencies. During security hours, the contract guards control access to the building at the first floor main entrance lobby area.

GSA's security assessment noted that this building is accessible to the public without entry control during the normal business hours, but it did not address this as an area for improvement. Although GSA determined that the current protection services are adequate for this facility, its security survey report made a series of recommendations for improvements, including the installation of a stairwell cage door to prevent unauthorized entry to government leased space and the relocation of a contract guard desk located in the lobby in order for the guards to observe all of the elevators during security hours.

GSA Assessment of Security of a  
Leased Building With an EPA  
Tenant

GSA performed an initial physical security survey of a leased building in Washington, D.C., in February 1986 to determine the perimeter security needs. EPA is the primary agency. The facility houses 4,600 government employees and is owner-operated. The jurisdiction for the facility is concurrent, meaning that the District of Columbia has the right to exercise police authority concurrently with the United States law enforcement authority.

GSA notes that this facility is located within a shopping mall with several commercial businesses and banks, has a high level of public contact, and has a high property value. The facility is in a metropolitan residential business district and is in a moderate crime area. GSA made an assessment of the history of crime incidents based on the Federal Protective Service statistics for the facility and the metropolitan police department crime statistics in the commercial space and within a three-block radius of the exterior of the building. GSA reported that its Federal Protective Service statistics for the facility revealed 139 crimes were committed during fiscal year 1985. Metropolitan police department statistics for a 6-month period in 1985 revealed 77 crimes concentrated in the commercial space and within a three-block radius of the building.

GSA's overall analysis of the risk potential to the facility determined that although there is a history of theft in the building, these incidents are not occurring at a high rate. GSA noted that the agency's function is sensitive, and the building operates under a closed building concept, with contract guards controlling the entry and exit for this facility on a 24-hour basis, and Federal Protective Officers patrolling the facility. Furthermore, although GSA noted that there have been nonviolent demonstrations and bomb threats at the facility, and there is a general concern for terrorism throughout the Washington area, there is no data that would indicate EPA is a target.

The purpose of the GSA physical security survey was to determine the perimeter security needs for the facility. GSA determined, based on its security assessment, that the current protection services were adequate and that the security systems for the facility were adequate. GSA had no findings and made no recommendations on the security needs for the facility.

The EPA office responsible for EPA's physical security measures advised us that their experience has indicated that the crime rate in this area is somewhat higher than the GSA statistics indicate.

GSA Assessment of Security of a  
Federal Building With a DOE  
Tenant

GSA performed a physical security survey of a government-owned complex in Maryland in November 1984. This was the first security survey to be conducted on the complex by GSA. The complex houses the Department of Energy with approximately 1,400 employees. The purpose of the survey was to evaluate the physical security of the perimeter of the complex and the perimeter of the buildings located on the grounds of the complex.

The property is federally-owned and the federal and local governments have concurrent jurisdiction. GSA states that the complex has a physical protection status of closed facilities which house sensitive governmental functions. It noted that there are no access controls to the complex, and the main building is the only area on this complex with strict access controls.

GSA notes that the complex is on about 12 1/3 acres of land in an area that is becoming mostly residential. The complex is not supposed to have any public contact, but because there are no access controls, vehicles take short-cuts through the complex and from time to time children play on the grounds. GSA states that potential exists for larceny of government and personal property and vandalism. The potential for demonstrations, terrorists acts, etc., are remote at this time because of the location of the complex. However, as the area around the complex is developed and people move into the area, the potential for such activities would change because of the mission of the agency and the controversy over nuclear power, according to GSA.

The GSA security survey states that current protection services are provided to this sensitive DOE complex by uniformed contract guards. GSA notes that the basic duties of the contract guards are to control access into and patrol the main building, thereby serving as a deterrent to unauthorized personnel entering the building and to persons attempting to remove property from the building. The patrol within the building is to detect any criminal activity and unsafe condition which may occur. The contract guards also monitor all alarm systems, including intrusion alarms and fire alarms, 24 hours a day. GSA provides a Federal Protective Officer who performs the same services for the whole complex as a law enforcement officer, whose duties include, but are not limited to, the protection of life and property.

GSA determined that there is no need for a high concentration of security at this time because the DOE complex is located in an area that is somewhat remote but growing in population. However, GSA also determined that as the population increases, more security measures will be needed.

**GSA Assessment of Security of a  
Leased Building With a FERC  
Tenant**

In December 1985, GSA performed a physical security survey of a leased building in Washington, D.C., occupied by the Federal Energy Regulatory Commission, which is the primary tenant agency. This was the initial security survey conducted by GSA to determine the perimeter security needs for the building. This facility houses approximately 625 government employees and is owner-operated. GSA notes that the occupant has a low level of public contact, a high property value, and has a sensitive function. GSA further notes that the facility is located in a metropolitan business district in a low crime area, and the building has a risk potential for vandalism, robbery, and theft of government and personal property.

The security survey report notes that GSA's history of crime incidents for the facility revealed that during a 10-month period in 1985, 36 crimes were committed. Metropolitan police department statistics for the exterior of the building covering a one-block radius for the same period revealed 13 crimes. GSA's risk potential states that although some thefts have occurred in the building, these incidents are not occurring at a high rate, citing 22 larceny thefts and 2 vandalisms during the 10-month period.

GSA's security survey states that current protection services are provided by contract guards who control entry and exit for this facility 24 hours a day, 7 days a week, and Federal Protective Officers who patrol the facility. The emergency response time by Federal Protective Officers is 5 to 10 minutes, and GSA considers the emergency response time adequate. GSA noted that based on its security systems assessments for the facility, security is adequate, and this facility meets the standard level perimeter security guidelines.

The office responsible for FERC's security and safety functions told us that there were several statements in the GSA security survey which, in their opinion, do not reflect true data. They said the FERC headquarters facility houses 950 federal employees rather than the approximately 625 reported, and that reporting the FERC facility to have a low level of public contact is extremely inaccurate as there are daily hearings, bi-monthly Commission meetings, and conferences attended by the public.

Further, FERC notes that its headquarters facility is geographically located within blocks of one of the "known illegal drug trafficking centers," and that it has been documented through public and media reports that this area attracts criminal activity. FERC also said that its facilities are also located near several shelters for the homeless, which results in exposing FERC personnel to panhandling, verbal abuse, and the potential for physical assault. Additionally, FERC points out that it has received delegation of authority from GSA, and therefore, FERC notes that Federal Protective Officers may perceive that they are no longer responsible for maintaining routine patrols and evaluations of contract security services, in that Federal Protective Officers do not conduct routine patrols at its headquarters facility, but do respond if requested during emergency situations.

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## Security Problems and Limitations Identified by Agencies

In addition to the security surveys performed by GSA, we also determined whether the selected agencies had conducted security surveys of the space they occupy. The headquarters agencies have all performed security assessments of the GSA-controlled, government-owned or leased space that they occupy and have identified deficiencies and areas for improvements. The following is a synopsis of the EPA headquarters security assessment.

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### EPA Facilities

A physical security survey of EPA headquarters facilities was conducted in December 1985 to assess whether adequate safeguards were in place to protect agency employees. EPA noted that the survey was more complex than anticipated because employees' attitudes toward security varied. Some believed that EPA should be an open agency, and others felt that EPA has responsibility for providing absolute security for all employees. The basic EPA assumption underlying the survey was that reasonable security must be provided for all employees and that security procedures should be consistent in all EPA headquarters buildings.

EPA noted that during the course of the survey, discussions were held with EPA personnel to elicit their opinions and suggestions concerning current security procedures and adequate levels of security. EPA states that although the majority of employees interviewed agreed that the current level of security was acceptable, some felt that the agency should significantly overhaul the existing security apparatus in all headquarters buildings. EPA states that although it would be very expensive and inconsistent with the open agency philosophy of the current leadership to attempt to provide absolute security, every effort is being

taken to develop and implement a degree of security that is reasonable and effective and provides a safe and secure environment for employees.

EPA states that its headquarters facilities are GSA-leased buildings, and although GSA's Federal Protective Service has primary responsibility for security of the buildings, contract guards are responsible for controlling access and responding to emergencies inside the buildings. As we have noted in appendixes III and IV of this report, GSA does not provide access control to its buildings as a standard security service. It has been left up to the individual agency management to determine the need for access control through the use of contract guard services.

EPA also states that since it is considered an open agency and visitors must have access to agency personnel during normal working hours, absolute security cannot be guaranteed. EPA notes that although its physical security survey reports of EPA headquarters facilities indicate that current security procedures for headquarters buildings are acceptable, the findings indicate that the overall security program can be improved and upgraded.

The security survey report states that one of the single most important issues required to enhance security is the attitude and support of senior management. EPA notes that discussions with employees indicate that more positive direction and control from senior management are needed in the area of security. Many felt that the current intense interest in security will subside without a statement from senior management.

The report also indicates a need to review expansion of the electronic access control system being implemented in headquarters facilities and a need to enhance security procedures relative to more closely monitoring visitors' access to EPA facilities. The report also identified a need for EPA to raise the consciousness of employees about crime prevention. The report noted that many of EPA employees are totally unaware of measures they could take to protect themselves. According to the report, it would be most beneficial to employees if the agency developed a viable and operational employees awareness program or organized employee awareness committees. The report further noted that the security support staff charged with the security mission at EPA headquarters and nationwide is understaffed and that EPA is heavily contractor-dependent.

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As a result of the survey, a series of security recommendations were proposed to management for implementation along with the notice that the recommended improvements for personnel security for headquarters facilities will require funding that is not included in the budget. A summary of major security recommendations outlined to management follows:

- (1) The Administrator should distribute a memorandum regarding the security reviews and security policies and procedures at EPA facilities in response to the tragedy (the violent death of an EPA employee at the EPA offices in Virginia leased by GSA).
- (2) Add additional full-time government employees to the security staff to work with contractor employees.
- (3) Obtain delegation of authority from GSA to directly contract for and supervise the security guard force.
- (4) Tighten access control procedures to include an employee requirement that identification cards be displayed at all times while in EPA headquarters facilities.
- (5) Require visitors to display passes while in EPA facilities.
- (6) Increase security awareness through seminars, bulletins, and other means.
- (7) Provide closer supervision of the contract guard forces.

Detailed reports on each specific headquarters facility were prepared and provided to EPA management, together with a breakdown of the estimated cost for implementing the recommended headquarters security enhancements. The following is a synopsis of the detailed security reports for the Virginia and Washington, D.C., EPA headquarters facilities.

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## EPA Headquarters Facility in Virginia

The detailed security report on the EPA headquarters facility in Virginia noted that as a result of the security survey to assess the vulnerabilities of EPA personnel working at this facility, a number of recommendations were proposed. The recommendations will raise the level of security at this facility to the same level as the Washington, D.C., headquarters

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facility and would include the requirement for positive identification in order to enter the facility.

The security report notes that the facility is a GSA-leased building. The federal government tenants occupy 11 floors, and GSA's Federal Protective Service has primary responsibility for security of the building. Besides EPA, the building tenants are the Department of Defense and the Patent Office. EPA notes that employees from other government agencies and other authorized visitors require access to the building daily to conduct business with tenant agencies, especially the Department of Defense, which must maintain an open facility because of the Department of Navy Consolidated Personnel Office. EPA states in its security report that since EPA is also considered an open agency and visitors have access to agency personnel during normal working hours, it is difficult, if not impossible, to guarantee absolute security. EPA notes, however, that its recommendations provide a much tighter level of security than previously existed.

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### EPA Headquarters Facility in Washington, D.C.

The detailed security report on the EPA headquarters facility in Washington, D.C., noted that the complex is rather difficult to secure. In reviewing the security situation, several factors influenced the survey, including (1) layout of the physical facility, (2) location of the facility, (3) budget constraints, and (4) inability to independently contract for guard services currently controlled by GSA. The security report notes that these factors have to be addressed in the long term and unless they are, EPA will have difficulty in providing security the agency requires.

The report noted that according to GSA, the theft rate is about the same as at other government agencies and only a few assaults have been made on EPA employees within EPA-controlled space. EPA noted in the report that although it is impossible to ensure absolute security for employees, measures are being taken to upgrade security and increase employee awareness, as well as solicit senior management support for this effort. The security staff's review of security procedures at the headquarters facility focused on findings and recommendations in five areas: (1) senior management support for the security program, (2) delegation of authority to contract directly for guard services, (3) stricter access and visitor control, (4) employee awareness, and (5) vulnerabilities.

Regarding senior management support, the report notes that during the course of the security survey, discussions were held with management

and EPA employees to obtain their opinions and suggestions on current security procedures and appropriate security levels. EPA noted that although the majority of employees interviewed agreed that the current level of security was acceptable, some were of the opinion that senior management needed to emphasize the importance of and continuing need for a viable security program. Employees emphasized that unless management provided more visible and positive direction for this effort, it would not succeed, and employees felt that a statement from the Administrator in this area was imperative. The EPA security report recommended that the Administrator issue a memorandum indicating senior management support for a viable and effective security program.

Regarding delegation of authority to contract directly for guard services, the report notes that the EPA guard service is GSA-controlled, and this has been a continuing and overriding concern of the security staff. GSA control has resulted in dual lines of technical direction for the guard force, with statements of work that do not always meet EPA requirements and evaluation criteria for guard services that are generic rather than EPA-specific. EPA notes that GSA has a primary responsibility to ensure that the guards are performing their duties in accordance with the contract agreement and their individual post orders, but that this GSA oversight is for the most part superficial. As a result, EPA spends a great deal of time and resources providing orientation and training for the guards. EPA states in its report that it has the management oversight in place to award and properly manage a competitively selected guard force; however, increased contractor and government staffing is needed. EPA notes that although there would be staff increases, they would be offset by substantial savings accruing to EPA since it would no longer reimburse GSA's Federal Protective Service for monitoring guard services. The EPA security report recommended that EPA request GSA to delegate authority to EPA to contract for its own guard service. EPA received delegation of authority from GSA in January 1987.

Regarding the need for tighter access and visitor controls, the report notes that in order for EPA to conduct its business, all headquarters facilities must be open to public and private sector personnel. During working hours at the facility, identification is required of government and nongovernment personnel; and after working hours, security measures are significantly tightened. The EPA findings indicate that there is a lax attitude on the part of the guard force to admitting personnel on EPA premises, and this laxness has resulted in some unauthorized persons

being allowed entry. EPA notes that the guard force needs to more vigorously enforce identity checks on all personnel on EPA premises. Additionally, EPA notes that the access problem is also exacerbated by the acquisition of leasing more space at the facility, which has resulted in employees passing through unprotected commercial space and becoming more vulnerable to physical assault. Another area of concern is the garage. EPA notes that employees have stated that security is better since the garage was fenced and access controls installed. However, a better emergency response capability is needed since there is little or no reliance on parking attendants for protection.

Regarding employee awareness, the report notes that one of the best security systems any organization can have is its own employee participation and involvement. Several interviews with employees revealed their desire to be educated in security awareness. EPA notes that when employees were questioned concerning measures they took to protect themselves, it was interesting to note their responses indicated a lack of rudimentary common sense precautions. EPA cites, for example, the fact that many of the employees indicated they work alone on weekends, walk alone to their automobiles, stand alone at bus stops, and walk alone through unlighted neighborhoods. Given these situations, EPA feels a need exists to educate employees concerning self protection. EPA feels it is important to distribute security awareness memoranda, redistribute the employee security awareness brochure, and sponsor security awareness briefings by local law enforcement personnel. Also, it would be helpful to think about establishing employee security and safety awareness committees.

Regarding vulnerabilities, the report notes that space at the facility is not contiguous, and to get from the main areas to other designated areas, employees must travel through non-EPA space. EPA notes that this non-EPA transit space may or may not be patrolled, and it is therefore potentially dangerous for EPA employees and visitors to use stairwells and elevators that are outside of EPA jurisdiction. The areas of question are the subbasement, commercial area of the garage, basement stairwells, and shipping and receiving areas. EPA states that guards have been requested to increase surveillance of these areas and cameras have been installed in stairwells to provide additional security for employees. EPA recommends that guard surveillance be continued in these areas and encourages the buddy system for people working late or on weekends.

## EPA Response to Chairman Dingell on Employee Security Matters

On October 16, 1986, EPA responded to inquiries made by Chairman Dingell on September 22, 1986, regarding criminal incidents against people at EPA facilities and employee security measures. EPA stated that it is now publishing a headquarters security bulletin to employees that contains an aggregate listing of types of crimes committed, along with articles stressing preventive measures and security projects in progress. EPA also enumerated security measures at EPA headquarters facilities and noted that at its Waterside Mall headquarters facility in Washington, D.C., no uncontrolled access to the building is permitted at any time. However, at its Crystal Mall facility in Virginia, no controlled access is provided during normal working hours, 7 a.m. to 4:30 p.m. Monday through Friday, because other agencies will not agree to it and GSA will not overrule them. EPA notes that controlled access to this facility is provided during security hours, which are 4:30 p.m. to 7 a.m. and 24 hours a day on weekends. EPA further notes that during nonsecurity or normal working hours, a contract guard is positioned in the lobby to assist visitors and respond to calls for assistance. Controlled access is not provided, and EPA space in the building is controlled by a card key access control system. We note that the security access control currently at this facility is essentially the same as that previously described in security assessments performed by GSA and EPA.

# GSA's Federal Protective Service Is Being Restructured and Its Mission and Role Is Being Redefined

GSA has undertaken a simultaneous review of its Federal Protective Service mission and role by its Inspector General and by its Public Buildings Service management in response to a December 1985 request by the Administrator of General Services. The Administrator, in requesting the reviews, noted that since the inception of the Federal Protective Service in 1971, its organizational mission and legislative basis have been extensively debated, and recent events have focused renewed attention on the Federal Protective Service mission and role. The GSA Commissioner of Public Buildings Service, in discussing the security in public buildings during the March 1986 House appropriations hearings, referred to the ongoing reviews of the entire security area and said a report would be available in a couple of months. During a January 1986 meeting with Senate Appropriations Committee staff, the GSA Commissioner also stated that the current Federal Protective Service mission would more than likely be changed as a result of the reviews.

## GSA Looking to the Future of Its Protection Program

The Administrator of General Services and the Commissioner of the Public Buildings Service established an in-house security action group in February 1986 to examine the current program for carrying out GSA's protection responsibilities. This group, working with the Assistant Commissioner for Real Property Management and Safety, found several areas for which new directions or additional emphasis are suggested. The group noted that in times of changing crime rates, budget constraints, large-scale reorganizations, and potential terrorist activities, it was prudent to re-examine the current protection strategy, the mix of resources used to deliver a protection program for federal buildings, the tenants and property housed in them, and the citizens who visit them.

Outlined below is the strategic direction for GSA's protection program developed by the security action group and specific major implementation issues. The group notes that while ultimate responsibility for the protection program lies with the Administrator of General Services and the Public Buildings Service, it is only through comprehensive and coordinated planning that involves the support and understanding of tenant agencies that the employees who work in, and citizens who visit, federal buildings will be able to be protected. The group further notes that with the delegation of operating authorities to tenant agencies, it is essential that the top-level managers of all federal departments and agencies appreciate their respective roles in the effective delivery of security and protection services.

## The Public Buildings Service Security Action Group Management Review

The Public Buildings Service security action group management review looked into the type and level of protection that should be provided, examined the current policies and procedures designed to provide a secure workplace, and recommended new program initiatives. The group's work included a review of existing statistical information, audits, studies, and evaluations concerning the security of government-owned and leased space; and a review of existing laws, regulations, and guidelines governing security. The security action group has developed a report of its findings and a plan for implementing recommendations for changes in GSA's security and facility protection program. Specific areas of consideration include GSA's existing policy and mission in providing security for government-owned and leased space, current standards and procedures, the level of service provided to tenant agencies, and methods of providing security services.

The security action group completed a decision paper on the future direction of GSA's protection program in July 1986 and presented it to the Commissioner of the Public Buildings Service on the restructuring of the Federal Protective Service. The July 1986 decision paper, entitled The Future Direction of GSA's Protection Program, was prepared to assist the Administrator of General Services, the Commissioner of the Public Buildings Service, and the agency's senior protection program managers in setting a strategic direction for the protection program. The July 1986 decision paper notes that the formation of the uniformed Federal Protective Service was originally conceived as a typical police force with the primary emphasis toward law enforcement, and that a multiplicity of factors (changing crime rates, budget constraints, reorganizations, terrorism) has required that a detailed, objective analysis and recommendation be made to redirect GSA's protection program away from law enforcement toward protection and security, limit costs, and assure appropriate levels of security to federal agencies. The major findings and recommendations of the decision paper on the strategic direction for the GSA protection program address the determination of risk at a given site, the workforce deployment, the workforce functional structure, the contract guard services, the funding for the protection program, the delegation of authority program, the involvement of tenant agencies, the jurisdiction issue, the management information system for the protection program, and the designing for security and integrating security consideration into other Public Buildings Service programs.

The security action group noted that adoption of the policy recommendations developed as a result of the protection program reexamination will result in a national security program to be designed and managed

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by GSA's protection staff for federal buildings under GSA's charge, including those delegated by the Administrator of General Services to other agencies. The group noted that some are already being implemented, while others will take several years to implement fully.

Some of the policy recommendations include:

- Evaluating security requirements for federal buildings under GSA's charge.
- Designing, installing, maintaining, and monitoring security systems on a reimbursable basis for delegated buildings.
- Contracting for on-site security personnel on a reimbursable basis where required by agencies' missions under current funding arrangements.
- Designing and conducting security awareness programs for building tenants.
- Monitoring the incidence of offenses in federal buildings on a national basis.
- Evaluating the security programs of agencies receiving delegated buildings authority.
- Responding to serious incidents in federal buildings and maintaining security patrols in cities where uniformed Federal Protective Officers are stationed.
- Developing criteria for assessing the vulnerability of federal buildings and for the application of counter-measures.
- Determining the level of countermeasures to be funded directly by GSA and the level to be funded by the occupant agencies.

The Public Buildings Service Assistant Commissioner for Real Property Management and Safety has discussed with us the results of its management study, the potential sensitivity of the issues discussed on GSA's strategic direction for the security and protection program, and GSA's concern for premature release of information regarding the proposed restructuring of the Federal Protective Service. The Assistant Commissioner, in furnishing us a copy of the decision paper by letter dated December 5, 1986, stated that the recommendations contained in this decision paper constitute the catalyst for a new security direction GSA is planning for the protection program. The Assistant Commissioner noted that before GSA fully implements any changes, it is necessary that those affected by any changes are thoroughly briefed. This includes GAO, Congress, the unions, and other government agencies.

We have been told by the Public Buildings Service Assistant Commissioner that some of the basic concepts and ideas of the Federal Protective Service Recovery Plan were not fully implemented but are still in effect, and the current study is a basic restatement and affirmation of the principles developed and contained in the Recovery Plan. This would mean that the management study and the Inspector General's review may represent a critical assessment of management deficiencies in implementing GSA's protection service program enumerated in its Recovery Plan developed several years ago.

## The Inspector General Review

The Inspector General issued to the Administrator a report in July 1986 pertaining to the proposed restructuring of the Federal Protective Service. The report identifies and addresses a number of specific issues and concerns to be considered by GSA's management before changes are implemented. The Inspector General states that the proposed restructuring of the Federal Protective Service would fundamentally alter the means by which GSA delivers its protective services to federal agencies.

The Inspector General stated in its report that a detailed audit of current operating procedures would not appear to be beneficial under the proposed restructuring of the Federal Protective Service. The Inspector General noted that its review did not cover a comprehensive audit of operations to determine compliance with current policies and procedures. However, it did cover background data on the legislative history, statement of mission and mandated responsibilities and functions, and a working knowledge of the organizational structure, manpower allocation, and workload. Based upon the results of its review, the Inspector General identified 11 specific areas of concern that GSA's management should be aware of in pursuing its current initiatives to restructure and redefine the mission and role of the Federal Protective Service.

The purpose of the concerns raised in the report by the Inspector General was to advise the Administrator of General Services of specific conditions and issues that may have an impact on the proposed restructuring before changes are implemented. For example, according to the Inspector General, GSA's management is considering reducing the law enforcement responsibilities of the Federal Protective Service and has placed increased emphasis on obtaining agreements with local police departments to respond to calls and enforce the law at GSA-controlled buildings. However, such a change in operation will have a direct impact on GSA-controlled buildings having exclusive federal government jurisdiction, those buildings in which only the federal government has law

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enforcement responsibilities. GSA's Inspector General noted that local law enforcement agencies have traditionally been reluctant to respond to calls at buildings with exclusive jurisdiction, and problems can arise if local police are called upon to enforce the law and/or make an arrest.

The concerns raised by the Inspector General fall into several broad categories:

- Congressional/Office of Management and Budget concerns. GSA should consider consulting them both prior to implementing any proposed changes to the current method of operation. Congress provided the authority to the Administrator of General Services to appoint special police with law enforcement authority as one means of providing security services, and the Office of Management and Budget was involved in the development of the Recovery Plan.
- Impact of the Building Delegation Program. The Building Delegation Program will require GSA to reevaluate its role and responsibility in delivering security services.
- Effect of placing greater emphasis on security services contracts. A significantly increased emphasis is being placed on contracting out certain protective services. Efforts will be needed in both GSA-controlled and delegated buildings to assure that proper levels of service are provided.
- Provisions for an investigative function if law enforcement responsibility is not retained. Under the proposed restructuring of the Federal Protective Service, current considerations include relinquishing investigative responsibilities and their corresponding workload to local police departments. Since this could result in reduced customer services, GSA management should assure that clear guidelines are developed on how the transfer of these responsibilities is to take place. Without clear policies and mutually acceptable agreements between affected parties, transferring this responsibility from the Federal Protective Service could be difficult, and GSA may require the Office of Management and Budget and/or legislative approval to do so. For example, matters pertaining to local police support for facilities under exclusive federal jurisdiction and retrocession of jurisdiction to the states would have to be resolved.
- Establishment of an effective management information system. To successfully implement the proposed Federal Protective Service reorganization, an adequate management information system will be essential. The proposed reorganization places a greater emphasis on contracting out for services and, therefore, will increase the need for a comprehensive information system to help manage these contracts and ensure adequate contractor performance. The Federal Protective Service has identified

some of its informational needs, and this data should be considered in designing a management information system for GSA's reorganized protective service.

- Establishment of an effective security program. The GSA Compendium of Federal Buildings Fund Real Property Related Services states the normal standard level of services to be provided for each building. The Federal Property Management Regulations state that security will be determined on a case-by-case basis. Therefore, all parties should be adequately informed about the level of security to be provided by GSA. GSA should also consider establishing a monitoring system to assure that a minimum level of security is maintained in delegated buildings housing agencies to which GSA has delegated authority to provide protection.
- Impact of retroceding buildings under exclusive jurisdiction. Since buildings/locations under the exclusive jurisdiction of the federal government are located throughout the United States, the law enforcement needs for these buildings should be assessed individually. If GSA seeks congressional approval to retrocede exclusive jurisdiction to the states, every effort should be made to obtain concurrence from the Office of Management and Budget and local and state law enforcement agencies prior to seeking such legislation.
- Negotiation of agreements with local authorities to provide law enforcement services. The Federal Protective Service has placed increased emphasis on obtaining agreements with local police departments in places with a limited Federal Protective Service presence. There is concern as to whether the document signers have the authority to commit their respective organizations to these agreements. The Inspector General notes that informal agreements were used most commonly to reach an accord. The Inspector General's concerns center around the legality of the agreements with regard to exclusive jurisdiction. Other concerns involve the need to clearly state the responsibilities and liabilities of each party involved and the need to assure that the officials entering into these agreements have the authority to do so.

## GSA's Proposed New Direction for the Protection Program

In March 1987, officials of GSA's Public Buildings Service outlined for us their program currently underway for a new security direction GSA is planning. The new GSA security program represents an effort to place into effect a more professional approach to building security, and is expected by GSA to provide a mix of Federal Protective Officers, local law enforcement, contract guards, and electronic security systems to meet each facility's security needs. GSA officials noted that they are progressing more rapidly than anticipated, and believe that all program goals will be achieved within the 4-year time period they have set, with

full implementation anticipated by September 30, 1990. The current actions underway involve the implementation of the following recommendations made by the management review group.

- Security resources assigned based on the level of risk. GSA-controlled buildings are being categorized according to new definitions of sensitivity. GSA has developed a "risk assessment matrix" for use in physical security surveys. The risk assessment method will be uniformly applied to determine an adequate level of security and physical protection unique to each building and leased space. A risk assessment matrix printout will portray each building's security status or level, developed from a formula incorporated into a computerized format. The resulting report will be the result of automatic calculations based solely on the data input into the computer's risk matrix system, with data input derived mainly from the scheduled security survey reports. GSA is planning to apply the matrix initially to the buildings surveyed during the last 3 years, and complete surveys using the matrix by September 1988. Thus, GSA anticipates that by the end of fiscal year 1988, surveys and matrix application for all buildings will be accomplished, and that beyond fiscal year 1989, surveys will be updated based on 1/2 of the inventory each year. GSA believes that by application of the risk assessment technique, it will be able to recognize and define security requirements for a facility, and assign security resources on a real need basis. Without criteria for assessing agencies' vulnerabilities, the adequacy of those resources cannot be determined. It is anticipated by GSA that the assessment will determine how Federal Protective Officers, contract guards, security systems, and locks and barriers are allocated.
- Concentrate Federal Protective Officers in major cities where risks are determined to be the greatest. GSA is designating 14 cities where there will be a Federal Protective Officer presence. GSA believes that this goal will be attainable through attrition within the 4-year program. GSA notes that to assist in accomplishing this goal, a freeze has been placed on law enforcement personnel for Federal Protective Officers outside of the designated cities, and Federal Protective Officers will not be hired in, or transferred to, any location that is not a designated city.
- Improve contract guard program. GSA notes that it has established a work group to produce a draft of new contract guard specifications which will provide for performance specifications in contracting. The working group is also developing procurement and administration concepts. Additionally, it is defining specific roles and developing a training program for all GSA personnel involved in contract guard administration.

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- Retrocede exclusive jurisdiction properties to the states. GSA notes that it is preparing a bill giving the Administrator of General Services authority to enter into agreements with the states to retrocede exclusive jurisdiction property to the state. The bill is to be submitted to the Office of Management and Budget for review and submission to Congress. GSA anticipates that the bill will allow it to clear up any jurisdictional problems in those locations without a Federal Protective Officer presence.
- Closer coordination with other Public Buildings Service offices for assuring that security considerations are integrated into future plans. GSA notes that current procedures for including security personnel in the review process of new construction, repair and alterations, purchases, and leasehold acquisitions, are not being uniformly implemented to ensure that security requirements are being addressed prior to any acquisition finalization. GSA notes that there is a coordinated effort underway to strengthen its policies and procedures.
- Redefine standard services and funding concepts for security. GSA notes that security needs will be determined through the risk assessment, and a basic level charge will be included in the rent. Security costs will be established in the physical security survey, with upgrades of the basic level charge made for areas with Federal Protective Officer presence, electronic security systems, and contract guards. GSA will consider these resources as enhancements of perimeter security, and plans to include them in the appraisal and rent-setting process. GSA plans to make this change on an interim basis with the fiscal year 1990 rent, and accomplish it on a permanent basis during the reappraisal process for the fiscal year 1992 rent. GSA notes that when it is determined that contract guards are required and are already in place on a reimbursable basis, they will continue to be charged as reimbursable in the interim until they can be included in the rent charge.
- Greater tenant participation in the security program. GSA notes that the importance of involving its tenants in the overall security process cannot be overstressed. GSA believes that its tenants are a major key in a successful security program, and their participation and cooperation is an absolute requirement. GSA notes that when physical security surveys are being conducted, agency officials will be involved in the entire process and their input and suggestions fostered and acted upon. GSA argues that information channels for dealing with security situations will be opened and fostered. GSA further notes that agencies should also be actively involved in crime prevention awareness programs, and that training programs need to be developed for tenants in contract guard monitoring and tenants utilized to the greatest extent possible in this effort.

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- Closer monitoring and coordination over security issues within delegated buildings. GSA notes that once it has delegated a building to another agency, it will retain responsibility to ensure that security levels are maintained.

# Delegation of Building Services to Agencies

GSA is involved in a program to delegate responsibility for building services to agencies, placing more responsibility on the agencies for operation and security of the facilities. The effect of delegations on security provided is that with delegated authority, agencies will no longer have to request contract guard services from GSA. Agencies with delegated authority may contract directly for guard services if they perceive the need for such services. Since GSA currently has no minimum security standards for level of security services, the agency develops its own standards.

The current GSA proposal to delegate building services to agencies in fiscal year 1987, placing more responsibility on the agencies for operations and security of facilities, and various planned security proposals, will change the security provided. Agencies without delegated authority must request and pay GSA for contract guard services to obtain special security. Agencies with delegated authority may contract directly for guard services. The delegation to agencies for contract guard management authority is viewed as positive by the four agencies identified in your request: EPA, DOE, FERC, and DOT. In addition, each of the four agencies has new security measures and proposals under consideration which will change the existing security.

## Effect of Delegations on the Protective Function

The Subcommittee on Public Buildings and Grounds of the House Committee on Public Works and Transportation held hearings in May 1986 on GSA's program for delegating authority to agencies for management of facilities. The program involves the proposed delegation of real property operations—including the protective function—to tenant agencies. Various agencies testified, including GSA, DOT, and FERC. The agencies' statements on delegation of security services were generally positive.

The agencies have contract guards because GSA provides only basic security, mobile patrol and response to incidents, and the agencies' managements perceive a need for more security services. Contract guards for access control are requested, and paid for, by the agency. The guards are contracted for and managed by GSA on a reimbursable basis for the agency if the agency does not have delegated authority. If the agency has delegated authority, the guards are contracted for and managed by the agency directly.

A synopsis of the positions taken and the statements made before the Subcommittee regarding the delegation of protective services follows.

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## The GSA Position

The Administrator of General Services stated that GSA's buildings delegation program reflects its general belief that the management of the government's operations should reside primarily with the departments and agencies themselves. The buildings delegation program is one of GSA's major efforts to place operating responsibilities with those agencies and organizations best able to perform these functions. In general, GSA believes that agencies know best their day-to-day buildings management requirements, will assure that quality services are provided in a cost-effective manner, and are best able to integrate building management with other management concerns, such as mission-related requirements.

GSA's plan is to complete the majority of delegations by fiscal year 1987. Under the delegations program, agencies will assume responsibility for the day-to-day management of government-owned and government-serviced facilities, as well as the management of leases under their responsibility.

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## 1987 Public Law Provision

The GSA Assistant General Counsel, Public Buildings Division, stated, in a January 1986 correspondence regarding the delegation of law enforcement authority to heads of federal agencies, that the Federal Property and Administrative Services Act of 1949, in pertinent part, authorizes the Administrator of General Services to delegate any authority transferred to or vested in him to the head of any other federal agency. The GSA Assistant General Counsel noted that

"the broad authority given to the Administrator to delegate authority, . . . coupled with his authority to detail GSA special policemen and extend GSA buildings rules to property under the charge and control of the head of another agency . . . leads to the conclusion that the Administrator of General Services may delegate authority to the head of another Federal agency to appoint special policemen and issue rules and regulations for the protection of property under the charge and control of that agency and over which the United States has acquired exclusive or concurrent criminal jurisdiction."

The GSA Office of Inspector General notes that there are about 1,100 buildings which have exclusive jurisdiction, and about 500 buildings under concurrent jurisdiction. Further, there is also proprietary jurisdiction, and about 5,500 of the 7,100 GSA-controlled buildings are under proprietary jurisdiction whereby the local or state law enforcement agencies are responsible for enforcing the law. The Inspector General notes that GSA's management is considering reducing the law enforcement responsibilities of the Federal Protective Service, and that such a

change in operation will have a direct impact on buildings having exclusive jurisdiction. The extent of GSA's law enforcement responsibilities within its buildings depends on the type of designated jurisdiction. Under exclusive jurisdiction, only the federal government has had enforcement responsibilities. Under concurrent jurisdiction, the state, in ceding legislative jurisdiction to the federal government, has reserved its criminal jurisdiction, but allowed concurrent federal criminal jurisdiction. Finally, under proprietary jurisdiction, the local or state law enforcement agencies are primarily responsible for enforcing the law. The GSA Inspector General notes that for buildings designated with exclusive jurisdiction, problems can arise if local police are called upon to enforce the law and/or make an arrest.

Public Law 99-591, making continuing appropriations for the fiscal year 1987, provides separate authority for agencies with delegated authority to employ special police. The law provides that when "the Administrator of General Services delegates responsibility to protect property under his charge and control to the head of another Federal agency, that agency may employ guards to protect the property" who should have the powers of special policemen. P.L. 99-591, 101(m) 609, 100 Stat. 3341-329 (1986).

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## The DOT Position

The Assistant Secretary for Administration discussed DOT's experience with GSA's building management delegations program. The Nassif Building (DOT's headquarters building) delegation was effective on October 1, 1982. The Department was included in GSA's pilot delegation program to test the feasibility of tenant agencies taking over the management of their buildings.

The Nassif Building is a leased owner-operated building, and DOT now performs those functions that the GSA used to do, including physical security, primarily through administration of guard contracts. DOT's overall reaction to the delegation is positive, primarily because of improvements in service delivery. DOT believes, for example, that the quality and timeliness of the security services have improved by DOT having direct control over the guard contracts.

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## The FERC Position

The Director, Office of Program Management, discussed FERC's experience with the delegation of authority by GSA. As a result of the delegated authority to operate its facilities in Washington, D.C., FERC has experienced improvements in the quality of the contract security services.

FERC notes that the effectiveness of security services continues to be improved through the evaluation of contractor performance by FERC security personnel. The activities of the contract security personnel are monitored on a daily basis by FERC personnel responsible for coordinating and directing the security program. As a result of the FERC reviews and evaluations of contractor performance, the number of security guards has been reduced and additional responsibilities incorporated into the security post orders. FERC said that the delegation of authority has resulted in cost savings because contract security services under the FERC contract cost less than under the GSA contract.

FERC believes that the delegated authority to operate its lessor-owned facilities has thus far been successful. FERC states that the delegation program has improved its response time to problems concerning facilities, and this has had a positive effect on the morale of its employees and the environment in which they work.

## Security Measures and Proposals That Will Change the Security Provided

The four headquarters agencies' facilities have completed studies or have studies underway to determine what their security needs are, and recommendations are being made and implemented on an as-needed basis on security measures and proposals that revise and change the security provided. Contract guard security services at the headquarters facilities are being continuously revised, and new contracts for guard services are being let. Under delegated authority, FERC was considering revisions to its contract guard services, and DOT was in the process of replacing its contract guard services. EPA and DOE have GSA contract guards and have requested delegated authority to contract for and manage their contract guard security directly. DOE has been granted that authority and will replace the existing two GSA guard contracts at its two headquarters facilities with one contract guard service incorporating its own requirements. Until DOE awards its contract, guard services at its headquarters facilities are being provided through extensions to GSA's contracts. EPA, while waiting for delegated authority, has had its GSA-provided contract guard services at its Washington headquarters facility replaced; the old contract expired and a new guard service company was awarded the contract. EPA received delegation of authority for operation and lease administration of its headquarters facilities in January 1987, with protection of these facilities part of the operational requirements delegated to EPA by GSA.

# Conclusions

According to GSA, no standard currently exists as to what constitutes the basic level of protection service. No criteria exists for assessing the vulnerability of federal buildings and, consequently, the application of protection services to be funded and provided by GSA can not be adequately determined. Thus, the issue of security, which can be emotionally charged, involves decisions made on a decentralized and judgmental basis rather than by objective analysis based on GSA-established criteria and guidance.

The lack of government-wide security standards for federal employees in government buildings precludes a determination of the adequacy of security services provided. It also may result in different levels of security being provided to federal employees at different locations. Further differences may also occur between security provided to federal employees in delegated buildings by the agencies and in nondelegated buildings by GSA.

GSA's policy of eliminating fixed-post security for building access control from its physical protection and building security programs and providing mobile patrols only is not fully in compliance with Federal Property Management Regulations (41 CFR ch. 101, 7/1/85 Edition, Subpart 101-20.5, Physical Protection). The regulations require that physical security surveys be used to determine the level of security needed to provide customer agencies with adequate protection, which may include control of building entry. To date there have been delays in the performance of the required security surveys and all buildings have not been surveyed, nor have criteria for level of service been established. Without criteria, standards, and assessments, the physical protection need requirements cannot be objectively determined.

The proposed delegated buildings program potentially involves over half of GSA's building inventory to be placed under tenant agency management. According to the GSA Office of Inspector General report in July 1986, minimum security standards are not currently being considered by GSA for agencies with delegated authority for management of delegated buildings, but consideration is being given to developing and providing minimum security standards for nondelegated buildings and property occupied by agencies without delegated authority to be retained under GSA's management. This, we believe, could result in different levels of security being provided to federal employees in delegated buildings by the agencies and in nondelegated buildings by GSA.

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We believe that if GSA reduces its law enforcement responsibilities, federal employees in buildings with exclusive jurisdiction could be left in an environment without adequate police law enforcement, unless GSA assures that local police will not be reluctant to respond to federal work place needs.

As previously noted, GSA's Office of Inspector General and Public Buildings Service have been studying the role of the Federal Protective Service and its possible restructuring. The Administrator of GSA is currently considering what actions should be taken in the future based on the findings of the studies. Also, GSA's Public Buildings Service officials informed us in March 1987 that they are considering corrective actions which would resolve several of the issues raised in this report, including (1) the absence of a basic minimum standard level of security and protection service, (2) failure to adhere to requirements to make security surveys of all properties under its control, and (3) implications of GSA's present policy of not providing access control to buildings.

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